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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Walters	Richard	N	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6) [redacted]			

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6) [redacted]			

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name		

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Laurel	MS	39443	Jones	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in *Title 50, Part 13 of the Code of Federal Regulations* and the other *applicable parts in subchapter B of Chapter I of Title 50*, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted] 3-9-17

Signature of applicant (Use of 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:_____(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:

   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:

      Lusese Conservancy, Zambezi Region Caprivi, Nearest City Katima Muhlo

   b. Date wildlife was hunted: 6 Oct 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 ear,2 feet,2 tusks, 1 tail & 1 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 document]:

      Kobus Honiball : Farm Otjiru 139 , Outjo 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:	Kobus Honiball
Address:	Farm Otjiru 139
City:	Outjo
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:** _____

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: (X) (b) (6) [redacted] Date: 3-9-17

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):
Richard Walters (b) (6) [redacted]

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

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

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.:	151005
VALID FROM:	03/10/2014
VALID TO:	18/10/2014

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: R. N. Walter

Residential Address:

Country: USA

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
	Buffalo	
CITES II	Crocodile	
	Dik-dik	
	Eland	
CITES I	Elephant problem	1
	Giraffe	
	Grey Duiker	
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
*	Please report back	
	Within 48 hours	
	after shooting	
*	TO identify the	
	elephants ME7	
	Staff to accompany the	
	hunt.	
⇒	NB NB 20 000 00 to be	
	paid to the SPCF	

On the following farms / hunting concessions: Luiseb Conservancy

Guided by (name of guides): J. H. Mouton

Cashier receipt No.: ME7 46856

Issued on 02/10/2014

Amount received: N$ 100-00

Authorizing Officer

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

Official MET date stamp

The following certificate must be compl ed immediately after each anir l 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
06/10/14	Elephant	Reported to Ballistic						55	Male	Lusese			[redacted] 99	
													NA 14 1200	
													~~NA 14~~	
													NA 14 0115	16.05
													NA 14 0116	15.15

*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.

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 signatur (b) (6) [redacted] Date: 3-9-17

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):
Richard Walters (b)(6) [redacted]

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

☐ Yes ☒ No RNW 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.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA27652C-0

Effective: 04/06/2017 Expires: 04/05/2018

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:

RICHARD N. WALTERS

(b) (6) [redacted]

LAUREL, MS 39443
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 2014 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).

Form 3-200-52

JAN 28 2019

OMB Control No. 1018-00
Expires 08/31/20

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Walters	Richard	N	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Laurel	MS	39443	Jones	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

01/24/2019

signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

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

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
Richard Walters (b) (6) [redacted]

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

   ☒ No ☐ Yes

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

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA27652C-0

5. Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification -** Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

      I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

      Permittee's signature (b) (6) Date: 01/4/2019

   b. For **CHANGES** to original application:

      On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

      I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

      Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

6. Past activities

b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

We have been awaiting export from Namibia. Shipment is now ready for export but my import permit has expired.

(b) (6) [redacted]

Signature

01/4/2019

Date

ELEPHANT IMPORT FROM NAMIBI

Permit Number: MA27652C-
Effective: 04/06/2017 Expires: 04/05/201

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:
RICHARD N. WALTERS
(b) (6)
LAUREL, MS 39443
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 2014 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

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: 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	1 b. First name	1 c. Middle name or initial	1 d. Suffix
Spindler	Danny	M	

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

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

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

1 a. Name of business, agency, Tribe, or institution	1 b. Doing business as (dba)

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

4 a. Principal officer Last name	4 b. Principal officer First name	4 c. Principal officer Middle name/ initial	4 d. Suffix

5. Principal officer title	6. Primary contact name

7 a. Business telephone number	7 b. Alternate telephone number	7.c. Business fax number	7 d. Business e-mail address

C. All applicants complete address information

1 a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1 b. City	1 c. State	1 d. Zip code/Postal code	1 e. County/Province	1 f. Country
Evansville	IN	47715	Indiana	USA

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

2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue 03US068871/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the
(b) (6)
herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (for Block 1A) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 03/21/2017

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 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: N/A (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: 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: Namibia, Otjozundjupa 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: (b) (6) [redacted] 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 M Spindler
(b) (6)
Evansville, IN 47715
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

ELEPHANT IMPORT FROM NAMIBIA

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 M. SPINDLER
(b) (6)
EVANSVILLE, IN 47715
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

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

Federal Fish and Wildlife Permit Application Form

RCVD APR 04 2018

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Spindler	Danny	M	

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

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

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Evansville	IN	47715	Indiana	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 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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA28045C-0 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the [illegible] herein may subject me to the criminal penalties of 18 U.S.C. 1001.
(b) (6) [redacted]
Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 03/26/2018

Response to Page 2 of 10, Question 3 (a):
There are no cleared documents or form 3-177 associated with this permit yet. See (b) response.

Response to Page 2 of 10, Question 3 (b):
I hunted elephant in Namibia from July 15, 2017 through July 22, 2017. I hunted in Namibia, Otjozundjupa Region, N#A JAQNA Conservancy, "Bushmanland". This information was provided for in my application for permit MA28045C-0. I received all the required Namibian government permits and on July 22, 2017 I legally harvested a male elephant. Since that time the skin, skull, teeth, tusks, bones, and feet have been properly salted, quarantined for the required 60 day time, and inspected by officials of the Namibian government. These items have been released from quarantine and delivered to Casper's Taxidermy located in Grootfontein, Namibia, where they are currently being dipped and certified by a veterinarian. Casper's Taxidermy has also applied to the Namibian government for the CITES, export permit and other documentation necessary for export. The tusks are also being ISO coded. Casper's Taxidermy tells me the trophy will not be dry from the dipping process until perhaps the first week of April, 2018.

Provided the trophy is dry enough for shipping by the first part of April, 2018, it can then be crated and picked up by the shipper (The Yellow Shark Holdings (Pty) Ltd.) and delivered to their warehouse in Windhoek, Namibia. I have been in contact with the shipping company and they have already applied to the South African government for a veterinarian permit. The shipment will have to first go to Johannesburg, South Africa and then can be forwarded on to the United States for clearing by the USFWS in Louisville, Kentucky. Namibia does not have direct shipping to the United States so everything must first go to Johannesburg, South Africa.

I spoke with my US importer in Louisville, KY and he informed me that he currently sees US shipping from Johannesburg being backed up for at least 2 weeks. My permit MA28045C-0 expires on Aril 19, 2018. Although everyone has been diligently working to meet that deadline, the realty is there are some items that cannot be controlled. Therefore, I am asking the USFWS to renew this permit to allow sufficient time to properly import this legally harvested trophy into Louisville, KY and be cleared by the USFWS office in that port.

Conservation Matters:
Because of my belief in conservation, I spent a great deal of time researching areas and outfitters before booking this elephant hunt. I wanted to hunt in an area where my permit and the money I needed to spend would go to improve habitat, contribute to anti-poaching programs, and work with those living in the area for a sustainable existence with the elephants. After much research, I selected Namibia and Thormahlen & Cochran as the outfitter. Specifically the area within Namibia was the N#A JAQNA Conservancy which is occupied by the Bushman (San) peoples. N#A JAQNA is located in the north east part of Namibia and is the largest Conservancy in the country. I also received the USFWS elephant import permit before hunting.

My outfitter, Thormahlen & Cochran, uses four approaches for conservation....(1) work with the Namibian government to limit the harvest in a way to insure sustainable elephant numbers, (2) improve habitat, (3) reduce illegal hunting, and (4) assist the government with anti-poaching programs. By working with the government, the harvest of trophy elephants is limited to two per year within the Conservancy. I saw at least 60 bull elephants during the time I was hunting and I only saw maybe a third of the area in the entire N#A JAQNA Conservancy.

I also observed at least three water pans built by the outfitter for elephants and other wildlife. The outfitter is also working to eliminate the unreliable windmills and replace them with solar panels at all water pans in the Conservancy, again improving the habitat for wildlife.

Improving relations, hiring, and educating the local people all contribute to stopping illegal hunting. The outfitter donates their own funds and uses money collected from their hunters to purchase school supplies for the local school children, contribute food to the villages, and hire local Bushman people. After harvesting the elephant, we (assisted by the government game scout and hired local people) spent two days hauling meat as far away as 250-350 km to the villages for consumption. Once the elephant retrieval was finished, nothing remained in the habitat. I observed many local people employed by the outfitter. The local people understand they would not have a reliable income source except for the work provided by <u>legal</u> hunting.

15-20 local people are hired by the outfitter to assist in the anti-poaching programs. Part of the fees I paid to the outfitter and for the Namibian government's permit is used to implement anti-poaching programs. While I was in Namibia, the outfitter met with leaders from the various villages and government officials in an all-day meeting to review the anti-poaching programs that are in place and make any necessary changes to improve the program. I was told this meeting happens on a regular basis to improve and monitor conservation efforts.

In summary I am asking for a renewal of my U.S. import permit for an elephant which was legally harvested at a time and place that was then allowed by the US government. This trophy would have been allowed by USFWS to be imported into the US except for the fact it could not finish drying in time and a backup in shipping occurred before the current USFWS import permit expires. Denying the renewal will not change the fact the elephant has already been legally harvested and in a country recognized as legal to harvest by the USFWS at the time of the hunt. The trophy is currently locked in storage in Namibia. I feel leaving this trophy in Namibia contributes to wanton waste of this animal. Thank you for your time and consideration. Please feel free to call me at (812)499-8951 should you have questions.

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 MA28045C-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. ATTACHED

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: (b) (6) [redacted] Date: 03/26/2018

   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):

   Same address as page 1

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.

   PREPAID FED EX LABEL IS ATTACHED TO THIS APPLICATION

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

Danny M Spindler, (b) (6) [redacted]

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

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

ELEPHANT IMPORT FROM NAMIBIA

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 M. SPINDLER
(b) (6) [redacted]
EVANSVILLE, IN 47715
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).

Barry , Anna <anna_barry@fws.gov>

Danny Spindler PRT #28045C

1 message

Barry , Anna <anna_barry@fws.gov> Wed, May 2, 2018 at 11:18 AM
To: (b) (6)

Dear Mr. Spindler,

In response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service is revising its procedure for assessing applications to import certain hunted species like African elephants. We are withdrawing our countrywide enhancement findings for a range of species across several countries. In their place, the Service intends to make findings for trophy imports on an application- by-application basis. Please be aware that we continue to seek additional information directly from the relevant foreign Government Authorities to support our permit findings, therefore, these applications are still under review.

Sincerely

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry , Anna <anna_barry@fws.gov>

Danny Spindler PRT #28045C

Danny Spindler (b) (6) > Wed, May 2, 2018 at 12:03 PM
To: "Barry, Anna" <anna_barry@fws.gov>

Thank you Anna for the response. I would appreciate being kept informed on the status so I can let everyone in Namibia, South Africa, and my US importer know of the status. I am having a hard time understanding how a renewal vs a new application are being treated the same but realize this is out of your control. If there is additional information you need from me or the Namibian government to assist in the determination, please let me know. The folks in Namibia have said they will assist wherever possible. Thank you Anna for your time.

Sent from my iPhone
[Quoted text hidden]

Barry , Anna <anna_barry@fws.gov>

Danny Spindler PRT #28045C

Barry , Anna <anna_barry@fws.gov> Wed, May 2, 2018 at 12:28 PM
To: Danny Spindler (b) (6) [redacted] >

Dear Mr. Spindler,

Because each application now requires an individual finding under the Endangered Species Act, all application both new and ones submitted for renewal, cannot be finalized until this review process has been finalized. Unfortunately I do not have a timeframe.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
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On Wed, May 2, 2018 at 11:31 AM, Danny Spindler (b) (6) [redacted] wrote:

> Thank you Anna
> I am not exactly sure what your email was explaining. I understand if this was an application for a new permit however it is not. The application is simply asking for a renewal in order to bring an already hunted trophy into the US. The trophy was legally hunted at a time and place recognized by the USFWS and issued an import permit. Through no ones fault the trophy simply could not be shipped into the US in time. The trophy has been ready to be shipped since the end of March but was stopped by me because of a April 18th import permit expiration. Please advise in order that I can let those individuals and companies in Namibia and South Africa know about this pending shipment. USFWS folks had advised me to apply for a renewal and not chance the shipment arriving after the import permit deadline.
>
> Sent from my iPhone

Anna

Good morning. Would you please update me with the status of this permit renewal? I have been contacted from Namibia and South Africa folks regarding their paperwork which apparently has a me limit on it.

Thank you

Danny M. Spindler

Email: (b) (6)
(b) (6)

Evansville, IN 47715

(b) (6)

From: Barry, Anna [mailto:anna_barry@fws.gov]
Sent: Wednesday, May 02, 2018 11:28 AM
To: Danny Spindler
Subject: Danny Spindler PRT #28045C

[Quoted text hidden]

Danny Spindler Wed, Jun 20, 2018 at 11:17 AM
To: "Barry, Anna (b) ( ) ( ) <anna_barry@fws.gov>

Good morning Anna

Is it possible to add addional in formaon t o my PRT #28045C applicaon?

Danny M. Spindler

Email: (b) (6)
(b) (6)

Evansville, IN 47715

(b) (6)

From: Barry, Anna [mailto:anna_barry@fws.gov]
Sent: Wednesday, May 02, 2018 11:28 AM

To: Danny Spindler
Subject: Danny Spindler PRT #28045C

Dear Mr. Spindler,

[Quoted text hidden]

Barry, Anna <anna_barry@fws.gov> Fri, Jun 22, 2018 at 1:00 PM
To: Danny Spindler (b) (6)

Yes, the information can be e-mailed to me.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
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[Quoted text hidden]

Barry, Anna <anna_barry@fws.gov>

Danny Spindler PRT #28045C

Danny Spindler (b) (6) > Mon, Jun 25, 2018 at 3:40 PM
To: "Barry, Anna" <anna_barry@fws.gov>

Thank you. My outfitter in Namibia contacting me about writing a le er regarding the hunt. I will email it as soon as I receive it.

Danny M. Spindler

Email: (b) (6)
(b) (6)

Evansville, IN 47715

(b) (6)

From: Barry, Anna [mailto:anna_barry@fws.gov]
Sent: Friday, June 22, 2018 12:01 PM

[Quoted text hidden]

[Quoted text hidden]

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

PERMIT / CERTIFICATE No.

0055895

Original

- [X] EXPORT
- [ ] RE-EXPORT
- [ ] IMPORT
- [ ] OTHER:

2. Valid until: 05/10/2018

3. Importer (name and address)
Danny Michael Spindler
(b) (6)
47715 Evansville
IN

3a. Country of import: U.S.A

4. Exporter / Re-exporter (name,address and country)
Anton Munhardt Alberts
P. O. BOX 90811
Windhoek
Namibia

Signature of the applicant

5. Special conditions
Not valid if not certified by the Namibian customs
Tusks no's: NA 17 0039 28.50 & NA 17 0040 27.95

All imports and exports remain subject to verterinary 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 ENVIROMENT AND TOURISM
Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp No.: 1556273

	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. 24/90 (2018)
	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. cape, tail, 2x ears, 4x feet & 10x skin panels	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 ★★★	
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 progated for commercial purposes
★★★ for pre-Convention specimens

13. THIS PERMIT IS ISSUED BY: J. Shapi

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
06 APR 2018
WINDHOEK
Private Bag 13306 Windhoek
Tel: 2842823 Fax: 258861

Windhoek — Place

06/04/2018 — Date

1556273 — Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Landing / Air Waybill Number:

Block	Quantity
A	
B	
C	
D	

Port of Export / Re-export | Date | Signature | Official stamp and title

Original

Namprint: 2308

Barry, Anna <anna_barry@fws.gov>

Danny Spindler PRT #28045C

Danny Spindler (b) (6) > Sun, Feb 10, 2019 at 12:04 PM
To: "Barry, Anna" <anna_barry@fws.gov>

Dear Ms. Barry

Please find a ached a copy of the Namibian government Cites Export Permit as well as a copy of The Yellow Shark shipping contract which shows the ISO coding numbers of each Tusk. Kindly add this to my Renewal Import Applicaon File PR T #28045C. If I need to send you a paper copy instead of an electronic copy just let me know.

Thank you for your assistance in this ma er.

Danny M. Spindler

(b) (6)
(b) (6)

Evansville, IN 47715

(b) (6)

From: Barry, Anna [mailto:anna_barry@fws.gov]
Sent: Wednesday, May 02, 2018 10:18 AM
To: Danny Spindler
Subject: Danny Spindler PRT #28045C

Dear Mr. Spindler,

[Quoted text hidden]

20190121111332125.pdf
494K

Barry, Anna <anna_barry@fws.gov>

Danny Spindler PRT #28045C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Feb 19, 2019 at 1:03 PM
To: Danny Spindler[redacted]

Received and added to your file.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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On Sun, Feb 10, 2019 at 11:05 AM Danny Spindler [redacted] > wrote:

> Dear Ms. Barry
>
> Please find a ached a copy of the Namibian government Cites Export Permit as well as a copy of The Yellow Shark shipping contract which shows the ISO coding numbers of each Tusk. Kindly add this to my Renewal Import Applicaon File PR T #28045C. If I need to send you a paper copy instead of an electronic copy just let me know.
>
> Thank you for your assistance in this ma er.

Danny M. Spindler

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(b) (6)

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(b) (6)

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Sent: Wednesday, May 02, 2018 10:18 AM
To: Danny Spindler
Subject: Danny Spindler PRT #28045C

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Anna Barry

Senior Biologist

USFWS/Division of Management Authority

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1. Name of area operator: Peter Thormahlen

   a. Years in business: 18

   b. Name of company conducting hunt: Thormahlen & Cochran Safaris

   2. Name of concession: **N#a Jagna Conservancy** Size in km^2: 9,120 or 900,120 ha

   a. Land tenure: __ Government lease _X_ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: 2016-2024 Can it be renewed? _X_ Yes __ No

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:

CONTRACTUAL OBLIGATIONS

- ANNUAL REPORTING -The Trophy Hunting Operator must submit an Annual Report Yearly within 30 days after the hunting season ends, which is 30 November. These Annual Reports are handed in at the Ministry of Environment & Tourism, as well as a copy at the Conservancy office, and the WWF office. Failure to submit the report timeously is punishable with a fine of N$5,000.

- MEAT DISTRIBUTION – All hunted Trophy, as well as Non-Trophy game meat is distributed to villages in the concession within 24 hours after being hunted. As a company Policy we do not leave any remains of elephant where it was hunted - no bones, skin, meat etc. After 2 days diesel is poured onto the stomach content and blood at the slaughtering site, wood stacked on top and burned. This is done to cause as little as possible stress on the elephants as there is no smell left of the hunted elephant or its remains. Elephant gets stressed seriously when bones and skin is left at the site!

VOLUNTARY DEVELOPMENTS /INVESTMENTS

- COMMUNITY INVESTMENT – We donate school stationary supplies for the local school through the SCI Blue Bag system in the amount of **N$54,000** per annum, buy uniforms for community game scouts and community camp staff to the value of **N$84,500**.
  We donate the trophy hunting camp which was built at a cost of **N$994,280** after a three-year period, back to the community and lease it from them so they can generate a monthly income from the trophy hunting camp. All maintenance is done by the Trophy Hunting Operator. The trophy hunting camp consist of 4 x client tents, dining area, kitchen tent, and 5 staff tents to the community.

The Daily Rent paid to the community in the Trophy Hunting Camp is **N$350** per person per day visiting.

- WILDLIFE WATER POINT DEVELOPMENT - Drilling and maintaining of the boreholes in the concession to establish Permanent Wildlife Water Points is a crucial part of the concession development as water allows the elephants to become resident in the concession compared to the previous yearly migration into the concession when the natural pans fill up with water during the rainy season. After which the elephants move back into Khadoum National Park and Nyae Nyae Conservancy where there is Permanent Wildlife Water Points.

  Currently 4 PWWP's (Permanent Wildlife Water Point's) have been established at a cost of **N$905,131** in the N#a Jaqna Concession Block.

  Installation of solar pump for water supply to the community members is also a crucial part of the community development program. Community members feel they are rewarded by the Conservation Developments when they receive fresh clean drinking water at their villages. This results in Wildlife Water Points being left alone and not damaged or settled around them, which chases the game away. **Attachment 1 – Wildlife Water Point Development Schedule**

- COMMUNITY EMPLOYMENT - We permanently employ 5 Community Members as Camp Staff, and 10-20 community members as Casual labor in the concession. The Casual Workers are employed 10 months per year to open roads in the concession, open the concession boundaries (Cutlines), and to skin elephants when hunted. The Permanent Staff gets a basic salary of N$2,000 per month which totals to **N$120,000** per annum.
  The Casual workers get a monthly salary of N$1,350 per month. On average **N$180,000** salary is paid per annum to Casual Workers who are community members, which is a great inflow of funds in the poor community.

- ANTI POACHING PROGRAM – Establishment of Wildlife Water Points is the first and most crucial development in the concession so that existing game becomes resident in the concession! After Permanent Wildlife Water Points (PWWP's) are established we start our Anti-Poaching program to protect the PWWP Equipment as well as the existing game. Currently all personnel are utilized as anti-poaching staff when no safaris take place. Community Game Scouts are on permanent anti-poaching patrols. Equipment and funding remain the biggest challenges as equipment is expensive.

  A serious Anti-Poaching program is needed. Funding major constraint, as Operator is spending every possible cent in the development of Wildlife Water Points. The idea is to establish the wildlife water points first so that there is permanent water in the concession, then start with an intensive Anti-poaching program. Mobility is a serious constraint in the anti-poaching effort as the area is

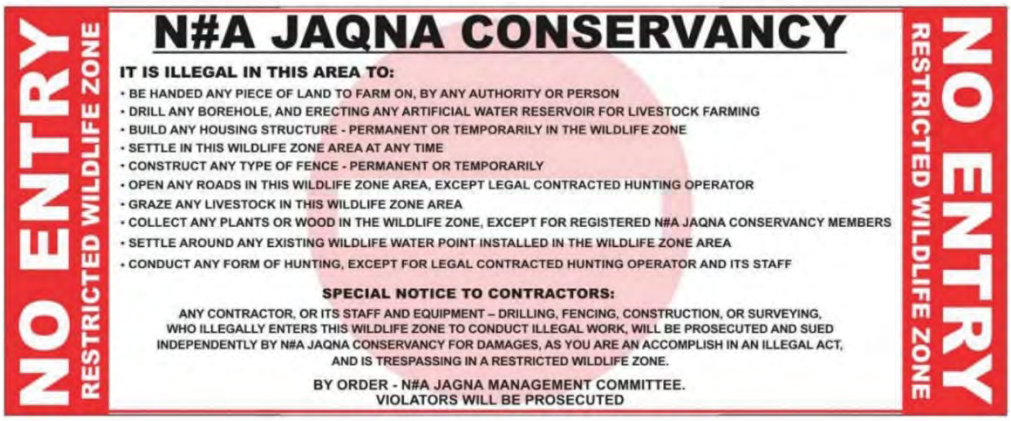
2,25 million acres big. In order to cover the concession properly four-wheeler quad bikes are needed, as well as several anti-poaching bases especially on the northern, and southern borders of the concession area, and radio communication equipment.

Now funding is done from Operators personal funds, and some small donations by hunters. We applied for a Grant from the DSCF (Dallas Safari Club Foundation) and will hopefully receive much needed funds to run a proper anti-poaching and PWWP establishment program. However, our Guides move around a lot in the area, visiting villages, and water holes to discourage poaching. With very positive results as much more game is visible since we got the concession in 2016, because of a higher visibility in the concession, hence less poaching.

However Solar Panels have been stolen by poachers on horseback on our southern border. Which means they come in from our neighboring Ondjou Conservancy as the San people are nomads without horses and livestock. To prevent any further theft, we installed trail cameras powered by a solar panel, and put up 12 feet high on a steel post with barbed wire around the pole preventing thieves to climb up the pole to destroy the cameras. It is small communities, so it will be easy to catch the perpetrator once we have their photos taken!

This area could be a dream concession if funding is available to drill for more water holes, open roads to be able to run an intensive anti-poaching program, and re-introduce game species shot out by the previous SA Army, neighboring and local poachers, i.e. red hartebeest, springbuck, Burchell's zebra, roan, sable, blue wildebeest, and warthog occurred in herds of thousands with none left today.

- NO ENTRY SIGNS



SIGN PERMISSION LETTER

Thormahlen & Cochran Safaris asked for permission to put up NO ENTRY signs at strategic positions to stop illegal land grabbing, and illegal drilling in the concession.

Approval was given by the N#a Jaqna Conservancy Management Committee and the first phase of the signs project is nearly completed. The first phase will be completed in 2019, and the secondary phase will be completed partly in 2019, and finally in 2020 due to the excessive logistics to put the signs up over the whole concession, the and the huge cost of the signs

December 5, 2017

The Chairperson
Me. Sarah Sungu
Conservancy Management Committee
N#a Jagna Conservancy
Mangetti Dune

Dear Sir/Madam

RE: LETTER-CHANGE OF CURRENT "NO ENTRY" SIGNS WORDING

We refer to the meeting held between N#a Jagna Management Committee and Trophy Hunting Operator Thormahlen & Cochran Safaris Namibia Pty Ltd on 1 December, 2017 at the N#a Jagna Conservancy Office at Mangetti Dune.

During our meeting the current NO ENTRY Signs placed at Border Cutlines entry points between Nohma and Nyae Nyae conservancy, were discussed. The Nyae Nyae conservancy as well as the Nohma San Community raised their concern regarding the NO ENTRY signs as they felt that the purpose was to keep San people from these two communities out of the N#a Jagna conservancy.

Thormahlen & Cochran explained in detail that the signs were placed to safeguard the conservancy Wildlife Areas land from the possibility of people from outside the San community illegally entering and building houses, or fencing the Wildlife areas due to the new roads and borders being opened. The N#a Jagna Management Committee

The N#a Jagna management Committee agreed with the Trophy Hunting Operator that this is a big threat considering the illegal land grabbing going on in the Conservancy. It was agreed that additional information will b added onto the existing NO ENTRY signs so that the San communities can feel free to move into and out of the areas.

N#a Jagna Conservancy Management Committee undertook to meet and decide on the additional information's wording, and that the Management Committee will inform Thormahlen & Cochran Safaris Namibia accordingly so that the correct sign information can be added by the Trophy Hunting Operator.

Thormahlen & Cochran Safaris will pay for the additional information needed to be added to the current NO ENTRY Signs, as well as the installation thereof.

We trust that our request will be looked at favorably for both the N#a Jagna Conservancy community, as well as the Trophy Hunting Operator of N#a Jagna Conservancy.

Thank you

Peter Thormahlen
CEO-Thormählen & Cochran Safaris Namibia Pty Ltd

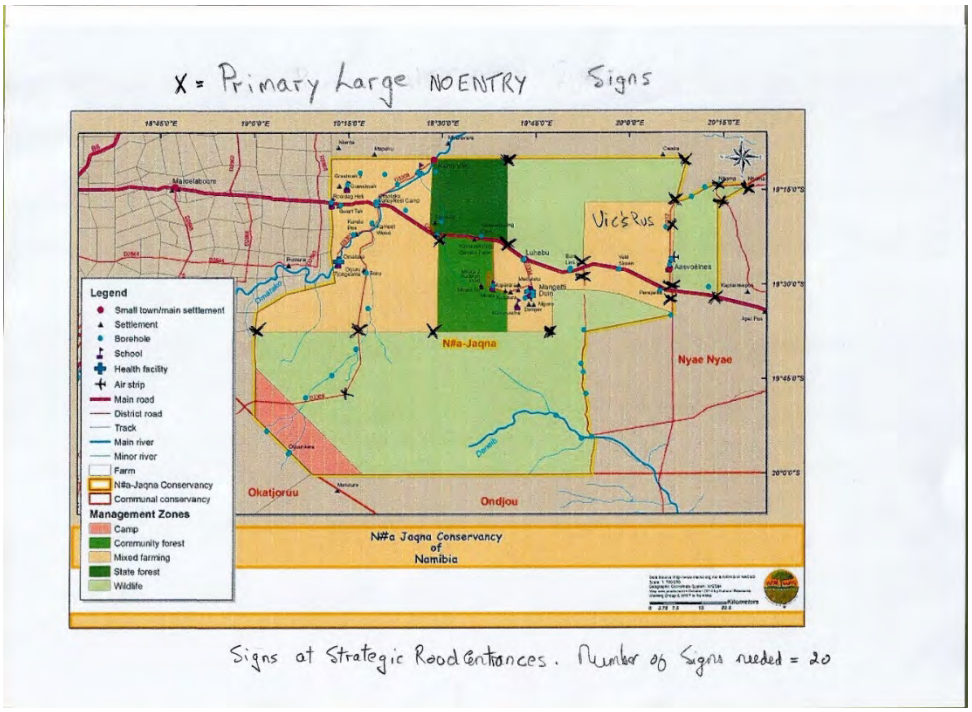
PRIMARY SIGNS

In order to stop the illegal settling and land grabbing of land in the Wildlife Zones of the N#a Jaqna Conservancy, Thormahlen & Cochran Safaris designed NO ENTRY signs with the written permission of the N#a Jaqna Management Committee.

Twenty Primary (Large) Signs will be put up at Strategic points - strategic roads and ploints where illegal land grabbers enter the Wildlife Zones to drop off workers, material, and equipment. It is especially important to have these signs visible so that Drilling Contractors can see them when illegally entering the Wildlife Zones, to illegally drill boreholes for illegal settlers.

A Special Notice on the sign refers to **Drilling Contractors** Illegally entering, and drilling in the Wildlife Zone.

"Ignorance is not an excuse to break the law", according to our Laws in Namibia.



Thus, by putting the signs at strategic entrances to the Wildlife Zone Areas, there is no excuse for a contractor of any kind, to enter a Wildlife Zone. When the signs are put up, a newspaper is used to establish the date when the sign was erected. No excuse as to when the illegal settlers entered the Wildlife Zone.

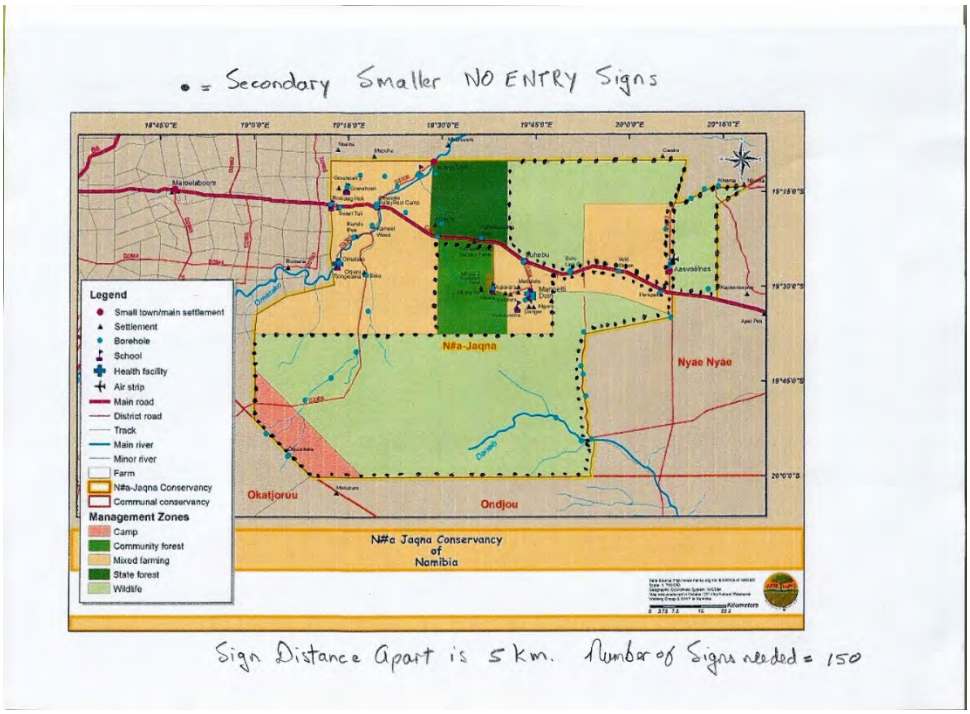
Thormahlen & Cochran Safaris is consulting with Lawyers in Windhoek in order to send a Legal Notice per registered mail, to all Drilling Contractors in Namibia, indicating the Wildlife Zone Areas in N#a Jaqna.

In the event any Drilling Contractor enters a Wildlife Zone to drill, we will get a Court Order against them to prohibit them from drilling boreholes in the Wildlife Zones, as they are obstructing our Contractual Obligation to develop the Wildlife Zones for Game.

It will be much easier, more efficient, and achieve better results, to go after the core of the illegal settling – the Drilling Contractors – than try and evict illegal land grabbers!

SECONDARY SIGNS

In order to have signs visible along all roads and borders of the N#a Jaqna Wildlife Zones, Thormahlen & Cochran Safaris will also erect smaller (Secondary) NO ENTRY signs Five Kilometres apart. Around 150 signs & frames will be needed for this exercise.



Without water no illegal settling can take place, as no one can farm without water for human and livestock!!

Drastic and outside the box measures, and funding, are needed to stop the illegal settling in the N#a Jaqna Conservancy Wildlife Zone.

COST OF CURRENT NO ENTRY SIGNS - 2018

- Invoice 10 x Primary Signs – N$9,890
- Invoice 26 x Secondary Signs – N$11,143.50
- Cost of Steel for 36 x Frames @ N$955 ea – N$35,820
- Welding Rods @ 5 kg -N$600
- Petrol for Generator to weld @ 200 litre – N$3,200
- Labour to manufacture Frames x 6 days x 2 staff @ N$75 ea pd – N$900
- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$3,000
- Cement x 10 bags @ N$100 – N$1,000
- Staff Labour to put up signs x 5 days x 2 staff @ N$75 pd ea – N$750
- Guide C Joubert Labour to put up signs x 5 days @ N$500 pd -N$2,500
- Vehicle to put up signs x 1,500 km @ N$6 per km -N$9,000

TOTAL COST TO PUT UP CURRENT SIGNS – N$77,803

PROJECTED COST OF FUTURE NO ENTRY SIGNS

- Invoice 10 x Primary Signs – N$9,890
- Invoice 130 x Secondary Signs – N$55,717.5
- Cost of Steel for 130 x Frames @ N$955 ea – N$129,350
- Welding Rods @ 25 kg -N$3,000
- Petrol for Generator to weld @ 1,000 litre – N$16,000
- Labour to manufacture Frames x 21 days x 2 staff @ N$75 ea pd – N$3,150
- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$10,500
- Cement x 50 bags @ N$100 – N$5,000
- Staff Labour to put up signs x 25 days x 2 staff @ N$75 pd ea – N$3,750
- Guide C Joubert Labour to put up signs x 25 days @ N$500 pd -N$12,500
- Vehicle to put up signs x 2,500 km @ N$6 per km -N$15,000

TOTAL PROJECTED COST TO PUT UP FUTURE SIGNS – N$263,857.50

- CAMP DINING AREA REPERATION COST

COST CALCULATIONS

- Vehicle Cost -N$6,480
- Thatching Grass – N$25,000
- Trailer Rental Cost – N$6,800

- Thatching Cost – N$3,000
- Thatcher Salary -N$4,500
- Casual Workers' Salaries -N$22,500
- PH Salary -N$15,000

TOTAL REPERATION COST – N$83,280

- N#A JAQNA AIRSTRIP REHABILITATION

Thormahlen & Cochran Safaris strive to develop the N#a Jaqna conservancy as much as possible. The N#a Jaqna Airstrip at Mangetti Dune was built by the South African Military during the Bush War period in Namibia. The airstrip is a huge asset, just being neglected, and is worth millions of Namibian Dollars if it had to be built today.

Instead of using the Tsumkwe Airstrip in Nyae Naye Conservancy, we opted to rehabilitate the Mangetti Dune airstrip. The Cost to rehabilitate the Airstrip is huge, but is worth it for us, as we feel that we must fly our clients into the concession where they hunt. The location of the Airstrip close to Mangetti Dune enables us to let clients see and experience the Mangetti Dune community.

We finished clearing the Airstrip, removed all trees and obstacles that gathered over the last 28 years since the end of the war.

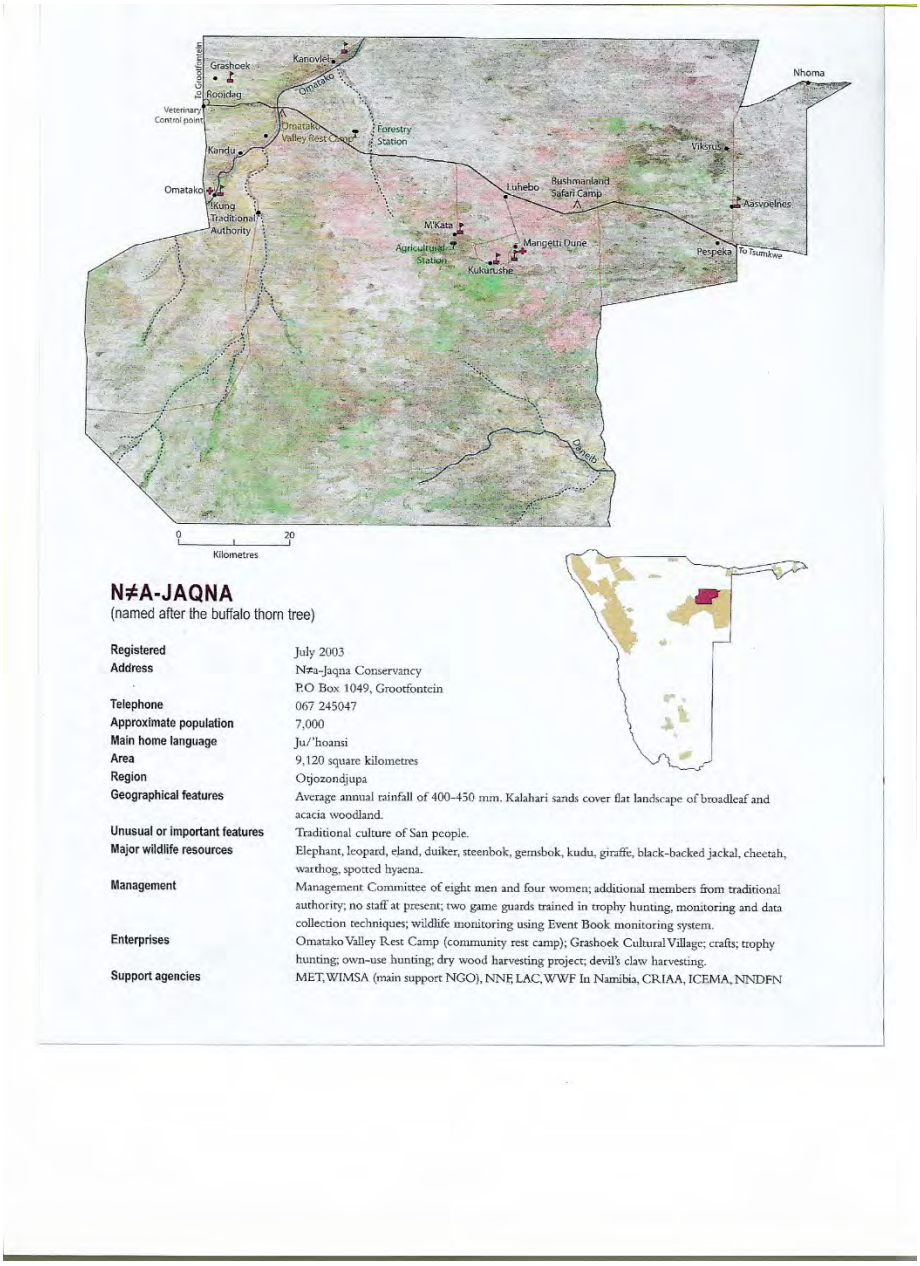
AIRSTRIP REHABILITATION COST-2018

- Casual Labor Cost – N$54,000
- Grader Cost – N$6,000
- Vehicle Cost -N$40,000
- Big Game PH Salary Cost – N$50,000
- Steel Wire to fence off Airstrip for Airplane Safety – N$33,000
- Anchor Poles – N$12,000
- Dropper Poles – N$21,700
- Trailer Rental -N$8,500
- Steel Gate – N$1,000
- Windsock -N$3,500
- Windsock steel post -N$1,000
- Cement -N$2,000
- Molopo Tree Poison – N$3,600

TOTAL AIRSTRIP COST – N$236,300

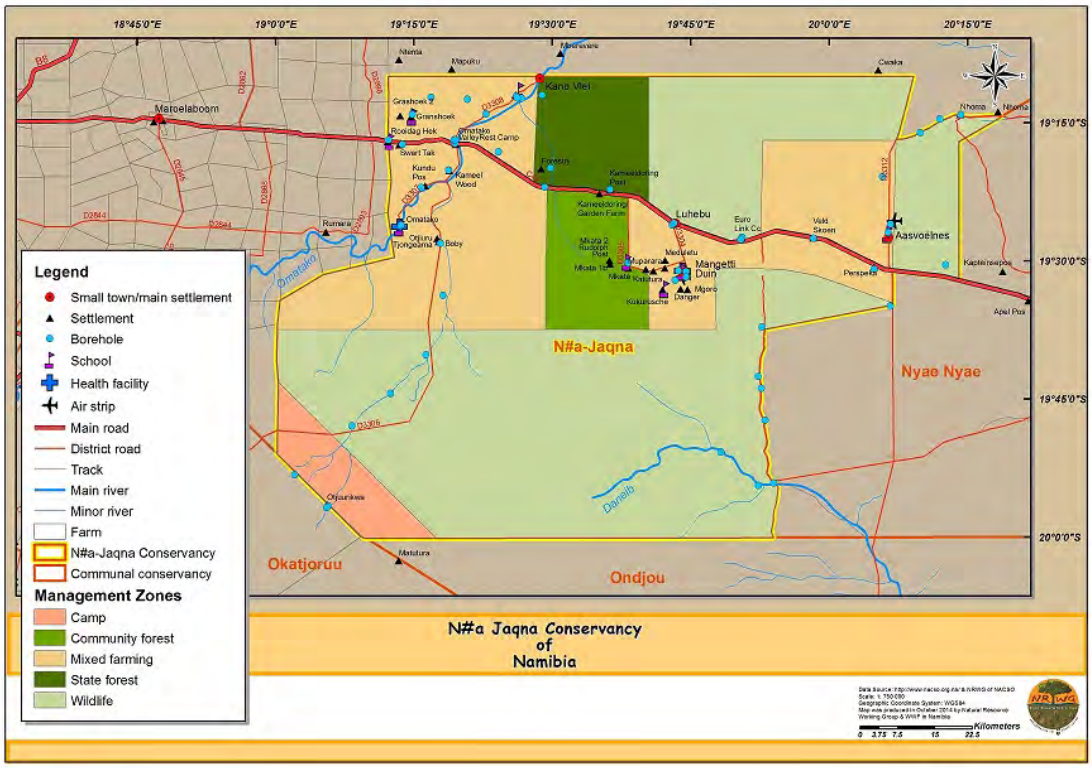
d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:

Concession Location: Located in the Bushmanland of Namibia.
South of the Kavango Region boundary of Namibia
West of Nyae Nyae Conservancy block
North of Ondjou Conservancy block
Closest Town: Tsumkwe town in Nyae Nyae conservancy
Closest City -Windhoek the capitol of Namibia which is 650 km away.

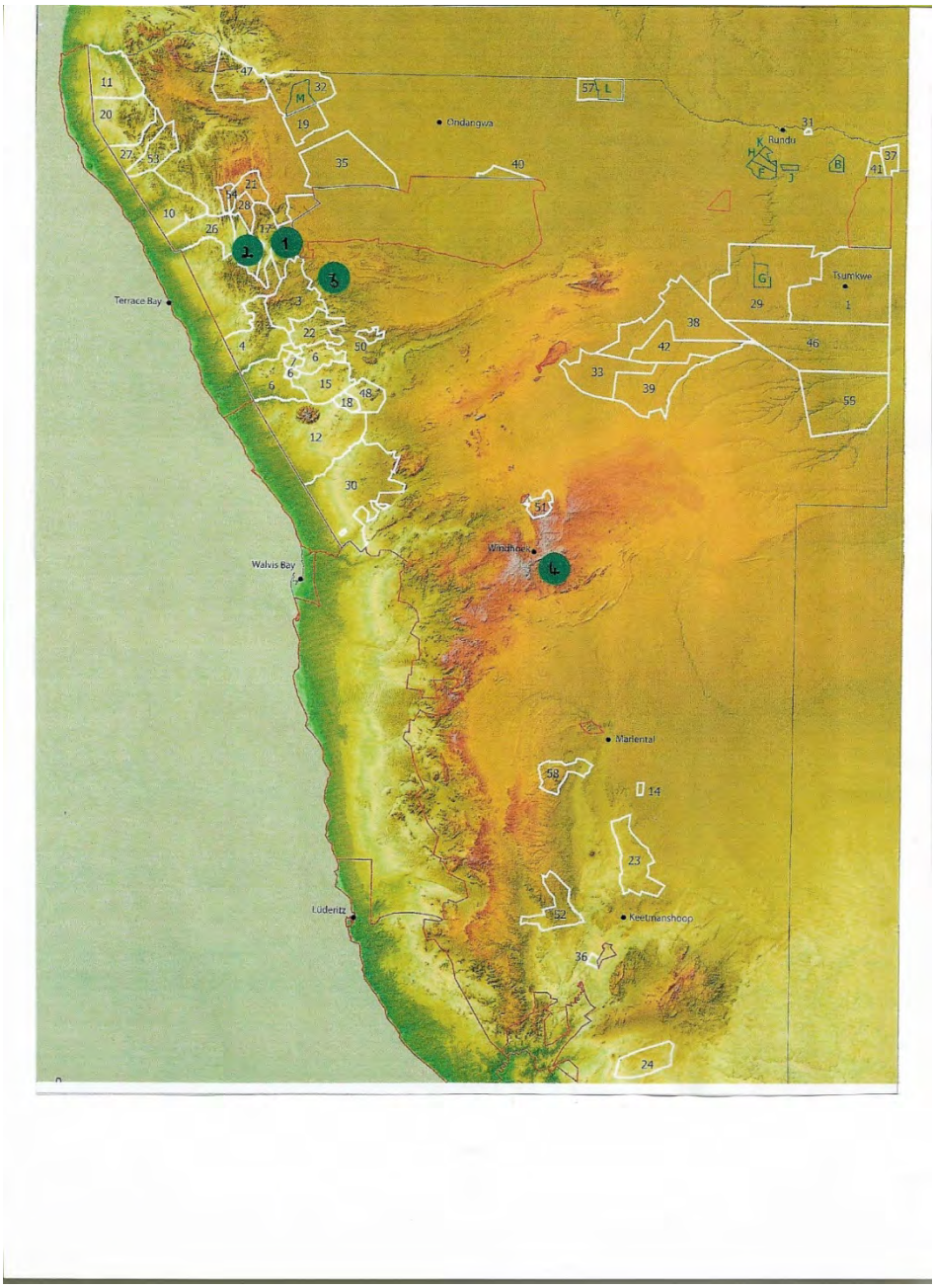


N≠A-JAQNA
(named after the buffalo thorn tree)

Registered	July 2003
Address	N≠a-Jaqna Conservancy P.O Box 1049, Grootfontein
Telephone	067 245047
Approximate population	7,000
Main home language	Ju/'hoansi
Area	9,120 square kilometres
Region	Otjozondjupa
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 staff at present; two game guards trained in trophy hunting, monitoring and data collection techniques; wildlife monitoring using Event Book monitoring system.
Enterprises	Omatako Valley Rest Camp (community rest camp); Grashoek Cultural Village; crafts; trophy hunting; own-use hunting; dry wood harvesting project; devil's claw harvesting.
Support agencies	MET, WIMSA (main support NGO), NNF, LAC, WWF In Namibia, CRIAA, ICEMA, NNDFN


18°45'0"E
19°0'0"E
19°15'0"E
19°30'0"E
19°45'0"E
20°0'0"E
20°15'0"E
19°15'0"S
19°30'0"S
19°45'0"S
20°0'0"S
Legend
Small town/main settlement
Settlement
Borehole
School
Health facility
Air strip
Main road
District road
Track
Main river
Minor river
Farm
N#a-Jaqna Conservancy
Communal conservancy
Management Zones
Camp
Community forest
Mixed farming
State forest
Wildlife
Matoelaboom
Kanb Wet
Luhebu
Mangetti Dun
Aasvoëlnes
N#a-Jaqna
Nyae Nyae
Okatjoruu
Ondjou
Omatako
Daniëls
N#a Jaqna Conservancy
of
Namibia
Kilometers

The N#a Jaqna block is number 29 on the below map.



e. If the concession borders a national park, please provide the park name: Concession does not border the Khaudum National Park, but lies 30 km south west of the Park

f. Description of general and distinctive habitat features and any water features:

Habitat:

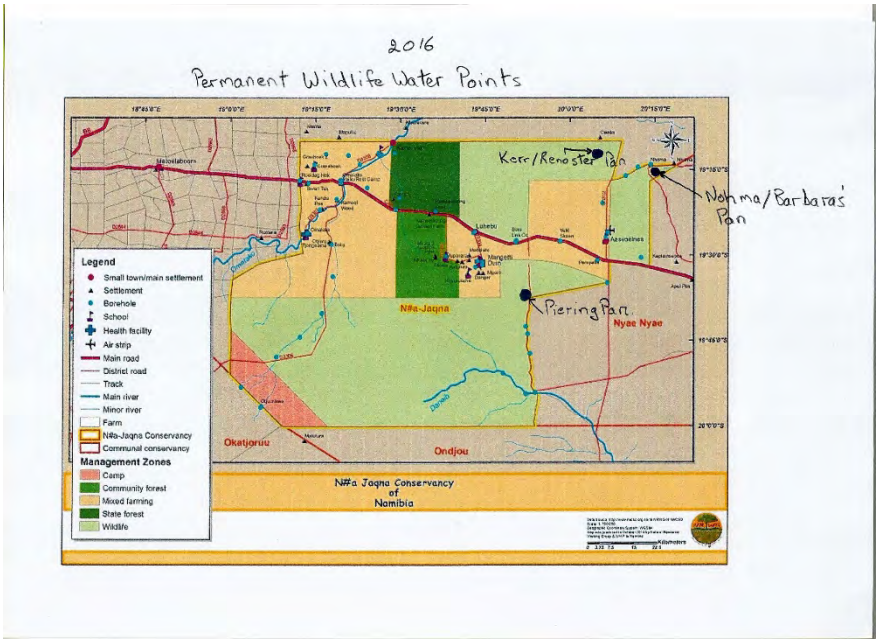
Average annual rainfall of 400-450 mm.

Kalahari sands cover flat landscape of broadleaf and acacia woodland.

Prehistoric dunes formed by Eolic sands blown in from the west coast of Namibia offers excellent habitat of broadleaf trees, yearly grass, rose thorn and raisin bush on the dunes while the area between the dunes ("dune streets") have plenty of climax grass species, black & white thorn acacia, and silverleaf terminalia trees offering a big variety of food for herbivores (browsers) as well as elephant. Some huge grass plains exist in the concession making it the ideal habitat for grass feeding species like springbuck, Burchell zebra, and red hartebeest as well as predators like cheetah which needs open spaces to hunt.

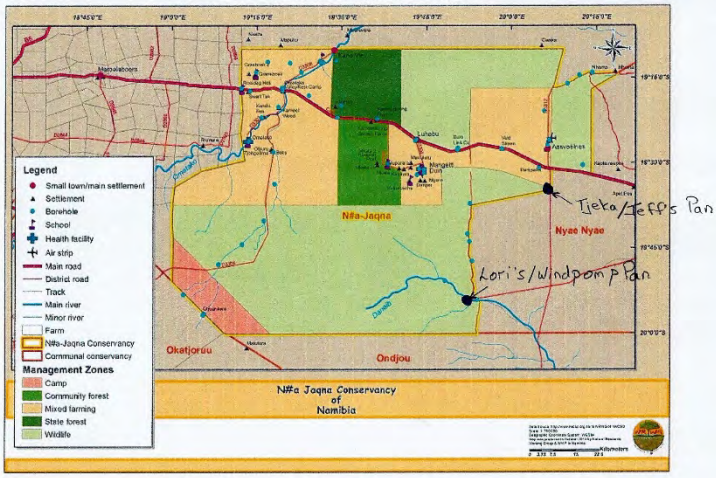
Water Features:

A number of Permanent Wildlife Water points (PWWP's) have been established in the N#a Jaqna Concession Block since 2016 when we started operating in the block.



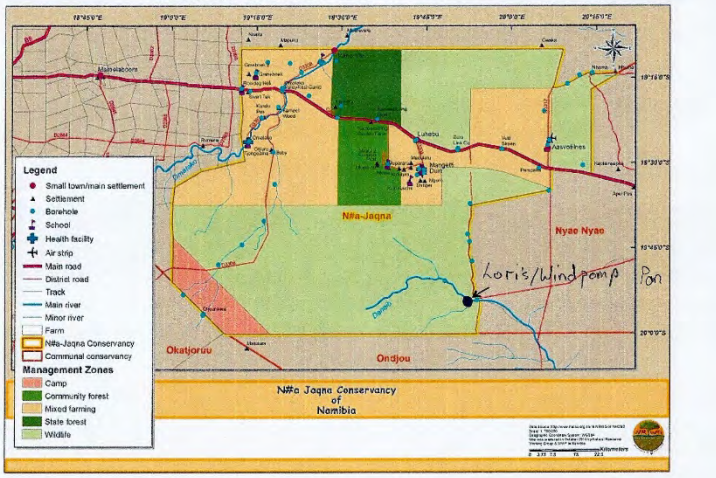
2017

Permanent Wildlife Water Points

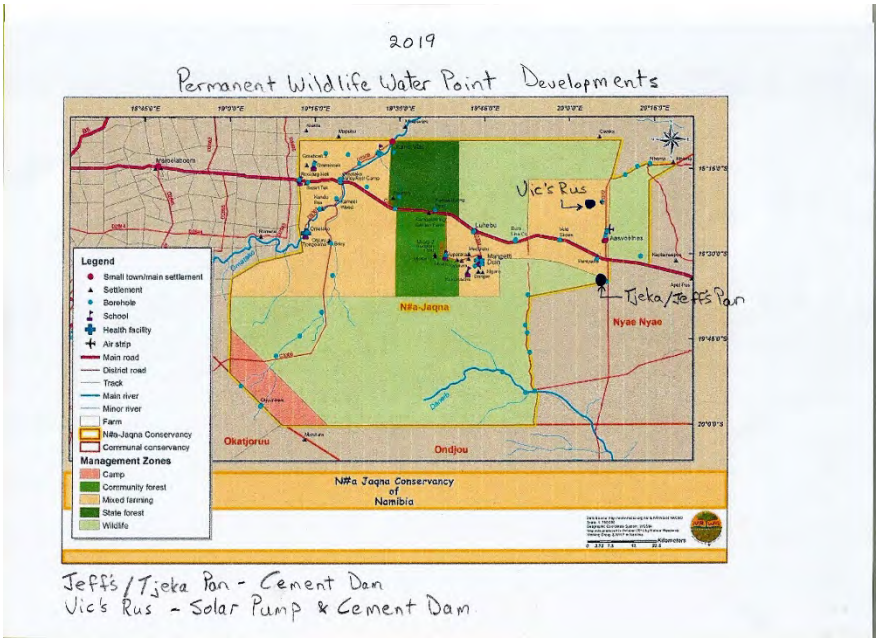


2018

Permanent Wildlife Water Points



Lori's Pan Repaired and Solar System re-installed.



TOTAL WATER DEVELOPMENT COST – 2018

Thormahlen & Cochran Safaris removed the entire Solar Panels and Pump at Lori's Pan and transported it back to Windhoek to be repaired.

Total invested in Wildlife Water Points in 2018 in N#a Jagna Conservancy is:

- Company Vehicle Transportation of Solar's to Windhoek and back – N$19,536
- Repair Cost at Cedar Solar – N$26,000
- Cement Cost – N$1,000
- Casual Labour Cost – N$6,000
- PH Labour Cost – N$11,666
- Steel Pipe, Welding Rods, Grinder blades etc. – N$1,200
- Petrol for Generator Welder– N$4,000
- Trailer Rental -N$13,600

TOTAL COST INCURRED 2018– N$83,002

Total Invested in Wildlife water Points from 2016-2018 in N#a Jaqna Conservancy:
Wildlife Water Point Cost 2016 – N$590,129
Wildlife Water Point Cost 2017 – N$232,000
Wildlife Water Point Cost 2018 – N$83,002
TOTAL COST INCURRED 2016-2018 – N$905,131

3. Are there any communities living in the concession? _X_ Yes __ No

   a. If so, estimated number of people or villages in the concession?

Approximate San (Bushman) Population- 7,000

4. Are there communities bordering this concession? _X_ Yes __ No

   a. If so, estimated number of people or villages around the concession?

Approximate Populations:
Nyae Nyae Conservancy on Eastern border- 2,300 San tribe
Ondjou Conservancy on southern border- 2,000 Otjiherero tribe
Kavango Region on northern border– Cattle Farms -Kavango tribe
Western Border- Cattle Farms – Mostly White Farmers

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	Dense	450-550	Rapidly Upwards due to PWWP (permanent wildlife water point) installations	Trail cameras at Water Points /Game Scout Sightings / Sightings by Hunting Guides / Tracks /MET
Lion	None	None	None	N/A
Leopard	Abundance	112-120 Average territory size is 8,000 ha	Stable	Trail Cams /Tracks/Sightings in Daytime
Cheetah	Sparse	20	Stable over last 3 years. Would like to relocate some cheetah with into the concession with collars when more game is available	Tracks / Sightings
African Wild dog	Dense	22-25	Stable over last 3 years. Would like to collar some Wild Dog when more game is available	Tracks/Sightings on the road and at waterholes
Caracal	Dense	100 +	Stable	Tracks / Sightings
African Wildcat	Dense	100 +	Stable	Tracks / Sightings
Spotted Genet Cat	Dense	100 +	Stable	Tracks / Sightings
Spotted Hyena	Average	30 +	Stable	Tracks / Sightings / Trail Cams

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Brown Hyena	Dense	75 +	Upwards	Tracks / Sightings / Trail Cams
Giraffe	Sparse	4-5	Stable	Tracks/Sightings
Cape Eland	Average	400 +	Upwards	Tracks/Sightings
SG Kudu	Sparse	100	Stable	Tracks/Sightings
Blue Wildebeest	Sparse	20	Stable	Tracks / Game Scouts
Steenbuck	Dense	1,000	Stable	Sightings / Tracks
Common Bush Duiker	Dense	1,000	Stable	Sightings / Tracks
Gemsbuck	Average	400 +	Upwards	Sightings / Tracks
Roan Antelope	Sparse	32 - 37	Upwards – Roan coming in from Nyae Nyae due to PWWP's installed on our Nyae Nyae border	Sightings / Tracks
Porcupine	Abundance	1,000 +	Stable	Sightings / Tracks
Guineafowl	Abundance	1,000 +	Stable	Sightings / Tracks
Francolin	Abundance	2,000 +	Stable	Sightings / Tracks
Doves	Abundance	10,000 +	Stable	Sightings / Tracks

6. Total employment number:

   Permanent Camp Staff – 6

   Casual Workers -20

   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	6	2
Trackers	7	1
Anti-poaching scouts/rangers	Scouts -8 / Anti-poaching - 8	8
Other anti-poaching	Anti-poaching Casuals -20	20
Cooks/housekeepers	Cook / Housekeepers - 2	2
Community coordinators	Management Committee - 9	9
Managers	2	1
Biologists		
Skinner	1	1
Tracker & Trainee Guide	1	1
Camp Attendant	1	1

7. Number of staff employed in the off-season:

   Camp Staff Permanently employed – 6

   Community Game Scouts employed -8

   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	Community Game scouts x 8	8	Jan-Dec
Casuals Anti-Poaching Staff	Casual Workers x 20	20	Dec-Feb
Managers	2	1	Dec-Feb
Maintenance			
Road opening/construction	Casuals x 20	20	March-Nov
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff:

      Community Game Scouts – Permanent -8

      Casual Anti-poaching Squad - 20

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? During & Off Seasons patrols are done on foot, and with landcruiser vehicle.

   c. Months during which anti-poaching patrols are conducted: Jan - Dec

   d. Number of anti-poaching patrols per month: 4

   e. Description of anti-poaching equipment, vehicles, etc.: Operator allocates a landcruiser hunting vehicle to anti-poaching during the off season. Done mostly on foot during the

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

hunting season, plus guides moving around in the concession during the hunting season. **Need funding to buy four-wheeler quad bikes**

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Operator & Conservancy Management Committee

g. Do you offer rewards to poaching informants leading to arrest? _X_ Yes __ No

h. Do you offer rewards to poaching informants upon conviction? _X_ Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **Namibian Dollar – N$**

Type of expense	Spending 2016	Spending 2017	Spending 2018	Remarks
Salaries for anti-poaching scouts	Game Scouts: 8 @ N$1,000 pm -N$96,000 Casual Team: 20 @ N$1,000 pm - N$40,000	Game Scouts: 8 @ N$1,000 pm -N$96,000 Casual Team: 20 @ N$1,000 pm - N$40,000	Game Scouts-: 8 @ N$1,000 pm N$96,000 Casual Team- : 20 @ N$1,000 pm N$40,000	Game Scouts-12 months Casual Scouts – 2 months
Equipment-Uniforms	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	Scouts x 8 Casuals x 20
Vehicles	N$20,000@ N$10 ,000 per month	N$20,000@ N$10 ,000 per month	N$20,000@ N$10 ,000 per month	Monthly cost of allocating land cruiser to anti-poaching
Diesel	N$50,000	N$50,000	N$50,000	
Rewards paid	-	none	none	
Other: _____	-			
Other: _____	-			
TOTALS	N$332,000	N$332,000	N$332,000	

9. Anti-poaching results:

Category	2016	2017	2018	Remarks
Poaching incidents discovered	13	9	4	Meat poachers
Ivory poachers arrested	none	none	none	No ivory poachers yet
Meat poachers arrested	none	none	3	Eland & Gemsbuck poached
Other poachers arrested	none	none	none	-
Poachers convicted	none	none	3	Locals -took them to tribal court where they got fines
Snares/gin traps collected	0	1	0	Poachers hunt with horses and on foot with dogs
Firearms confiscated	none	none	none	Spears & Bow Arrow
Vehicles confiscated	none	none	none	-
Bicycles confiscated	none	none	none	-
Boats/nets confiscated	-	-	-	-
Tusks recovered	N/A	N/A	N/A	No Ivory poaching yet
Carcasses observed	2	1	1	Gemsbuck & Eland
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? _X_ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution

Communities gets 100% of money contributed by Hunters for non-exportable game (Own Use Quota). The Donation for a Non-Exportable elephant is US$15,000 of which US$3,500 goes to the community, and the rest is used to establish PWWP's in the concession as wildlife water points is our primary development goal. Without water the concession is just a "Green Desert" because all surface water seeps into the sandy soil. Two non-exportable elephant is on quota yearly. The Communal fee is a contractual fee.

Our clientele is primarily USA citizens who donate SCI Blue Bags with school stationary supplies. Each hunter hunting in the conservancy donates between one and two SCI Blue bags with school stationary at a value of US$200 each bag. Hence a minimum of 5-10 SCI Blue Bags is donated at a value of N$13,500 to N$27,000. The SCI Blue Bag donations is a Voluntary fee.

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

c. Does the company provide game meat to nearby communities? _X_ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:

All the meat from trophy animals hunted, as well as the two Own Use Elephants on quota, must be delivered to community villages in the concession within 24 hours. The Conservancy Management Committee hands the trophy hunting operator a list of villages that need to get meat. Every villages have a representative that has to sign for the meat when delivered.

This is an Obligation stipulated in the Trophy Hunting Agreement. Failure to do so is punishable with a fine of N$22 per kilogram of the average carcass weight of the different animals. Failure to pay the fine is a breech of contract with immediate suspension.

Meat Value – N$:
Elephant x 4 @ 4,500 kg carcass weight @ N$22 / kg = N$396,000
Eland x 1 @ 350 kg carcass weight @ N$22 /kg = N$7,700
Gemsbuck x 2 @ 100 kg carcass weight @ N$22 = N$4,400
Warthog x 1 @ 30 kg carcass weight @ N$22 /kg = N$660
Steenbuck x 4 @ 7 kg carcass weight @ N$22 /kg = N$616
Duiker x 2 @ 10 kg carcass weight @ N$22 / kg =N$440
Total Annual Meat Value = N$409,816.00

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.

Very little fields in the concession area. Up till now no PAC animals declared.

The N#a Jaqna Concession block is not a horticulture area, and very little crops are raised. Mainly cattle, goats, donkey, and horses are raised by community members.

When an elephant damages any property, problem elephant situations are raised by the local community and it is addressed with the Chairman of the Community. The chairman then reached out to the Minister of Environmental and Tourism, who investigates the Wildlife Human conflict, and approves the problem animal permit in writing when enough evidence is collected by the Ministry. The Chairman then reached out to the Hunting Operator to provide a client. If a suitable client is found, there is a certain time limit to hunt the animal and the permit will be issued with the client's details.

The Operator must pay the community a predetermined contractual fee for the problem animal, and the meat has to be distributed to villages on the meat delivery list as per contract

f. Please describe any consolation payments made to residents damaged by game species. What currency are the expenditures reported in?

No consolation payments made to residents as the only cattle in the concession is owned by illegal landgrabbers. Court eviction case was won by the Conservancy in November 2017, some of the illegal farmers left, but some is still hanging in there. Any damages on livestock is welcomed by the San community in the concession.

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	N/A			
Lion	N/A			
Leopard	N/A			
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in**?** **Namibian $**

Type of project	Spending 2016	Spending 2017	Spending 2018	Remarks
Education (e.g., classrooms, offices)	-	-	-	-
Education (e.g., school fees, supplies)	N$125,000	N$125,000	N$125,000	School Stationary donations to the communal schools
Health (e.g., clinics, offices)	-	-	-	-
Health (e.g., medical salaries, equipment)	-	-	-	-
Community scout salaries	Casual Team: 20 @ N$1,000 pm - N$40,000	Casual Team: 20 @ N$1,000 pm - N$40,000	Casual Team: 20 @ N$1,000 pm - N$40,000	Casual Scouts – 2 months employed in off season
Other community anti-poaching- Uniforms	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	Scouts x 8 Casuals x 20
Local government activities	-	-	-	-

Water infrastructure improvements	- N$590,129	N$232,000	N$83,002	Wildlife Water Points
Sports teams funded	N$4,500	N$4,500	N$5,000	Soccer Team Uniforms
Construction materials donated	N$994,280	N$0	N$83,280	Trophy Hunting Camp, which is donated back to community at end of 2018 to lease to operator
Salaries & Training Camp Staff	N$621,320	N$375,000	N$303,000	Training and Salaries done
Trophy Fees Paid to Community	N$916,891.53	N$880,170.00	N$838,880	Trophy Fees for Game
Meat Delivered	N$409,816.00	N$409,816.00	N$409,816.00	Meat Delivered
Airstrip Rehabilitation	-	-	N$236,300	
TOTALS	**N$3,827,936**	**N$2,192,486**	**N$2,013,978**	

EXECUTIVE INVESTMENT / COST SUMMARY

TOTAL SALARIES & TRAINING COST- 2018

Thormahlen & Cochran Safaris spent the following amounts on training and labour in 2018:

- **Training of Camp Staff-N$75,500**
- **Camp Staff Salaries – N$120,000**
- **Casual Labour Salaries – N$108,000**
- **TOTAL COST – N$303,000**

TOTAL WATER DEVELOPMENT COST – 2018

Thormahlen & Cochran Safaris removed the entire Solar Panels and Pump at Lori's Pan and transported it back to Windhoek to be repaired.

Total invested in Wildlife Water Points in 2018 in N#a Jagna Conservancy is:

- Company Vehicle Transportation of Solar's to Windhoek and back – N$19,536
- Repair Cost at Cedar Solar – N$26,000
- Cement Cost – N$1,000
- Casual Labour Cost – N$6,000
- PH Labour Cost – N$11,666
- Steel Pipe, Welding Rods, Grinder blades etc. – N$1,200

- Petrol for Generator Welder– N$4,000
- Trailer Rental -N$13,600

TOTAL COST INCURRED – N$83,002

Total Invested in Wildlife water Points from 2016-2018 in N#a Jaqna Conservancy:
Wildlife Water Point Cost 2016 – N$590,129
Wildlife Water Point Cost 2017 – N$232,000
Wildlife Water Point Cost 2018 – N$83,002
TOTAL COST INCURRED 2016-2018 – N$905,131

Proposed Wildlife Water Point Investment on Tender:
Wildlife Water Point Cost Proposed 2016 -N$200,000
Wildlife Water Point Cost Proposed 2017 -N$250,000
Wildlife Water Point Cost Proposed 2018 -N$250,000
TOTAL PROPOSED WWP COST – N$700,000
(WWP-Wildlife Water Point)
This leaves us with a credit balance of N$204,631 compared to our proposed goal of N$700,000 in the first three years.

"NO ENTRY" SIGNS COST - 2018

- Invoice 10 x Primary Signs – N$9,890
- Invoice 26 x Secondary Signs – N$11,143.50
- Cost of Steel for 36 x Frames @ N$955 ea – N$35,820
- Welding Rods @ 5 kg -N$600
- Petrol for Generator to weld @ 200 litre – N$3,200
- Labour to manufacture Frames x 6 days x 2 staff @ N$75 ea pd – N$900
- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$3,000
- Cement x 10 bags @ N$100 – N$1,000
- Staff Labour to put up signs x 5 days x 2 staff @ N$75 pd ea – N$750
- Guide C Joubert Labour to put up signs x 5 days @ N$500 pd -N$2,500
- Vehicle to put up signs x 1,500 km @ N$6 per km -N$9,000

TOTAL COST TO PUT UP CURRENT SIGNS – N$77,803

PROJECTED COST OF FUTURE NO ENTRY SIGNS

- Invoice 10 x Primary Signs – N$9,890
- Invoice 130 x Secondary Signs – N$55,717.5
- Cost of Steel for 130 x Frames @ N$955 ea – N$129,350
- Welding Rods @ 25 kg -N$3,000
- Petrol for Generator to weld @ 1,000 litre – N$16,000
- Labour to manufacture Frames x 21 days x 2 staff @ N$75 ea pd – N$3,150

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- Vehicle to put up signs x 2,500 km @ N$6 per km -N$15,000

TOTAL PROJECTED COST TO PUT UP FUTURE SIGNS – N$263,857.50

CAMP DINING AREA REPARATION COST

- Thatching Grass – N$25,000
- Vehicle Cost -N$6,480
- Trailer Rental Cost – N$6,800
- Thatching Cost – N$3,000
- Thatcher Salary -N$4,500
- Casual Workers' Salaries -N$22,500
- PH Salary -N$15,000

TOTAL REPERATION COST – N$83,280

N#A JAQNA AIRSTRIP REHABILITATION COST

- Casual Labor Cost – N$54,000
- Grader Cost – N$6,000
- Vehicle Cost -N$40,000
- Big Game PH Salary Cost – N$50,000
- Steel Wire to fence off Airstrip for Airplane Safety – N$33,000
- Anchor Poles – N$12,000
- Dropper Poles – N$21,700
- Trailer Rental -N$8,500
- Steel Gate – N$1,000
- Windsock -N$3,500
- Windsock steel post -N$1,000
- Cement -N$2,000
- Molopo Tree Poison – N$3,600

TOTAL AIRSTRIP COST – N$236,300

TOTAL DEVELOPMENT / INVESTMENT COST - 2018

TOTAL INVESTMENT - N$783,385

was invested in N#a Jagna conservancy in 2018 in order to develop the previously marginal concession into a prime trophy hunting concession.

We saw the potential and took the risk to invest an enormous amount of money, time, and labor into the concession in 2016. Something no trophy hunting operator was willing to do in the last 11 years prior to us getting involved. And it is paying off as huge amounts of game is moving into the area!!

- Wildlife water points x 5 are now operational with Solar Pumps Installed.
- Cutline's of over 50 km were made.
- An additional 40 km of Hunting Roads were cleared.
- A super luxury Trophy hunting camp was built.
- Camp is fully Operational.

With five San community members trained to run and manage

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.?

We operate in South Africa and Namibia, and the figures below, is for the whole operation. In N#a Jaqna we only hunt what is allocated on quota, and it is fixed by the Government. The Namibian Government, specifically the Minister of Environment and Tourism, set strict quotas at the beginning of every three years, revising it at the end of each year when the Hunting operator must submit a Hunting Report on that specific year. So, before the client arrives, the hunting operator must take out a hunting permit – and this is only available if it falls within the quota that was pre-approved.

Current N#a Jaqna Trophy quota: 2 x trophy elephant, 2 x own use elephant, 4 x Steenbuck, 3 x leopard, 2 x Oryx, 1 x warthog. 1 x duiker.

The table below is for the total of Thormahlen & Cochran's concessions:

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all other species
Number of U.S. clients	2015: 4 clients 2016: 9 2017: 5 2018: 4	2015: 2016: 2017: 2018: 1	2015: 2 clients 2016: 9 2017: 9 2018: 10	2015: 126 clients 2016: 110 2017: 141 2018: 83
Percentage of U.S. clients	2015: 99 % 2016: 98 % 2017: 100 % 2018: 98 %	2015: 2016: 2017: 2018: 100 %	2015: 100 % 2016: 98 % 2017: 99 % 2018: 100 %	2015: 95 % 2016: 96 % 2017: 97 % 2018: 95 %
Trophy fees paid by U.S. clients – US$	2015: $220,000 2016: $495,000 2017: $275,000 2018: $260,000	2015: 2016: 2017: 2018: $75,000	2015: $42,000 2016: $225,000 2017: $256,000 2018: $265,000	2015: $303,715 2016: $1,075,000 2017: $997,375 2018: $410,110

12. Dollar amount and percentage of the company's revenue from U.S. clients:

    95 %

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.

    ENHANCEMENT INFORMATION

    Hunting Policies:

    Elephant – Our Company policy is to hunt only bulls older than 55 years of age. We work hard not to hunt elephant under 50 years of age, irrespective if it is a Trophy Bull, or Own Use bulls. We would like to change the Own Use bulls on quota to Trophy Bulls as it is financially much more lucrative for both the community and the hunting Operator. At the moment Own Use Bulls is hunted with no payment towards the community. All monies made from the Own Use Bulls is invested back into the hunting concession by the operator for the instalment of Wildlife Water Points. Hunting post productive bulls ensures that the breeding is not disturbed and enhances trophy quality.

    We follow the Aging Policy adopted and used with great success by the APNR - Association of Private Nature Reserves which is the Private Reserves adjacent of the Kruger National Park. The APNR uses the Aging Policy of the Kruger National Park in South Africa with great success and accuracy to determine tusk weight and bull age.

    Leopard – Our Outfit policy is to hunt male leopard of only 8 years and older, with a minimum year boundary of 6 years of age. This ensures that the breeding males can breed till they are 8 years old, without any disturbance. It works well as our trophy quality in the N#a Jagna Conservancy is improving every year as we adopted this policy since we started in the concession in 2016. We also see much more big cats in the concession as it seems that by taking out the old males it gives the breeding males more freedom and less competition from post productive males.

    Resting Areas

    There are two huge areas in the center north and south of the concession that has no roads and is used as resting / breeding areas. The concern however is that these two areas are used by poachers to operate from. We decided to open roads in these two areas, however conduct no hunting in these two areas, yet do anti-poaching patrols to keep poachers at bay.

CONCESSION IMPROVEMENTS

Trophy Hunting Camp

Please see the Annual Report for a detailed cost outlay of the Trophy Hunting Camp built, and donated back to the community after the third year, so the community can lease it to us to create a yearly income from the asset.

Airstrip

There are 2 Military Airstrips in the N#a Jagna Conservancy, which was used by the South African Defense Force in the 80's – ONE AT the main village Mangetti Dune, and the second at another small village called Aasvoelnes. The Trophy Hunting Camp is located 19 kilometers from the airstrip at Mangetti Dune. We opened the airstrip , got permission to fence it off from the Traditional Authority, and graded it so we can charter our clients to this strip. Previously we are used the Tsumkwe airstrip in Nyae Nyae conservancy which is 70 km from the trophy hunting camp.

Roads

Please see Annual Report for Roads opened, and Cutlines (borders) opened between N#a Jagna Conservancy and Nyae Nyae Conservancies

Wildlife Water Points

Please see annual report for detailed outlay of Wildlife Water points installed in the concession.

Anti-Poaching Program

The N#a Jagna Conservancy Concession was a "green desert" up until we started operating in it. It was even advertised for closed bidding by the WWF as a "marginal" concession, with lot of challenges, i.e. illegal landgrabbers, illegal fencing, and no very limited water holes in the concession. The previous operator called "Eden Safaris", did nothing in the concession for 11 years it operated in the concession.

When we won the bid for the concession, we used own funds and drilled 2 strategic boreholes on the border with Nyae Nyae and the Kavango region. Within 10 months we had two resident herds of elephant and lots of other game – please see Annual Report for detailed outlay and maps. We also installed solar pumps at three existing boreholes to supply a constant supply of water which is very important to get game to become resident in the concession.

Our enhanced activity in the concession is deterring poachers at the moment, yet we see more and more horse and dog tracks as the poachers is entering from the neighboring Ondjou Conservancy, which is also one of our concessions we acquired at the beginning of this year! So we will have to start a very well-coordinated and managed anti-poaching program ASAP in both concessions. At the moment we use 20 casual workers to clear roads, and the same xasuals work as an anti -poaching squad during December, January and February while the season is closed (December & January), and in February we are still at the USA Hunting Conventions.

Our biggest constraint is funding! This concession is a pristine area of 2,25 million acres with the Wildlife Area being at least 750,000 acres big. The lack of funds is a big problem. We have approached SCI but they said they don't finance such programs. I am currently working on completing a Concession Grant Request to submit to DSCF- Dallas safari Club Foundation in the hope that we can get a grant to install more water points, open roads, and re-introduce game species so much needed by the San Community.

Up until then all our efforts are self-financed with contributions from hunters.

Restocking of Game

During the eighties locals, as well as white Namibian hunters say that Springbuck, Red Hartebeest, Warthog, Blue Wildebeest, Southern Impala, Ostrich, Eland, Tsessebe, Gemsbuck, Kudu, Giraffe, even Sable, and Roan occurred through the whole area in herds of hundreds and thousands. Today there are only eland, gemsbuck, and kudu left. We will have to re-introduce the species wiped out!

For that we need assistance with financing!

COMMUNITY UPLIFTMENT

SCI Blue Bag Donations

Thormahlen & Cochran Safaris prides ourselves that we motivate our clients to donate a " SCI Blue Bag" full of school stationary worth US$200 at a local school in the communal areas. Last year we donated around 70 blue bags at schools.

Food for School Children

Poverty in the Communal Areas is a way of live. It is disturbing to see school children who only get one meal a day at the school, consisting of grits and soya sauce. We have clients who donate funds towards the purchase of maize meal and soya sauce which we donate at the local schools so the children can be fed.

Meat Delivery

We pride ourselves that we deliver all meat, and intestines of all hunted animals within 24 hours to the list of villages supplied by the Management Committee. Even the remotest villages is served with meat to ensure that the community benefits from the hunted animals.

MANAGEMENT ACTIVITIES

RESEARCH

African Wild Dogs

There are around 22-25 African Wild Dogs in the N#a Jagna concession. We would like to put satellite collars on some of the dogs to be able to monitor their movement in the area. They are critically endangered as a species, and we would like to assist in securing their future by constantly monitoring them in our concession area. This will provide valuable research information as to their hunting success, and movement in the concession area.

Cheetah

A very small number of cheetah is present in the concession area. After securing the Wildlife Water Points; when re-located game species numbers are high enough, we would like to release cheetahs in the concession area. Some of the cheetah will also get satellite tracking collars to monitor and study their progress.

14. I declare that the foregoing is true and correct.

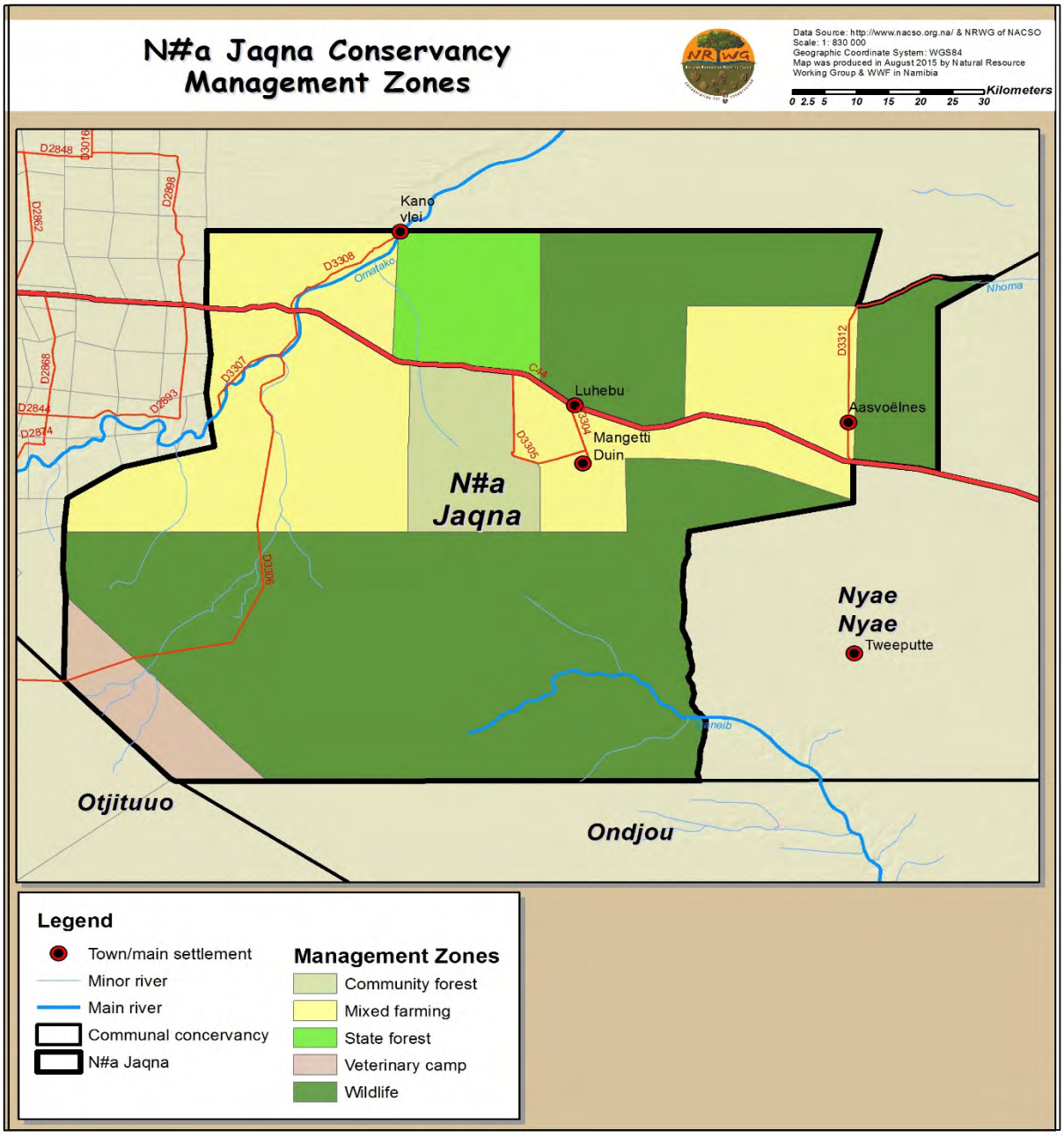
Signature:

Name: **Peter Thormahlen** Title: **Mr**

ATTACHMENT – 1 - Wildlife Water Point Development Schedule

1 **SCHEDULE 4**

Pledged activities and development;



2 **SCHEDULE 4**

Pledged activities and development;

Thormahlen & Cochran shall carry out all the items as stated in the Proposal to Na Jaqna for the first phase of the first three (3) years of the contract and attached as part of this agreement.

1. TROPHY HUNTING CAMP

T&C Safaris will build a Trophy Hunting Camp in N#a Jagna conservancy to Operate from. This camp will be built after an intensive study of the concession area keeping in mind water availability, impact on the concession, accessibility to hunting camp, distance from conservancy office etc. As well as recommendations from the N#a Jagna conservancy committee.

The Trophy Hunting Camp's permanent Structures will become the property of the Conservancy after the 3 year period expired.

2. WILDLIFE WATER POINTS

Please see Attached Map of N#a Jagna Conservancy.

The Wildlife Area of the concession was divided in three Zones:

- Block A
- Block B
- Block C

The Tender period is three years. Although it is understandable why an initial 3 year period is granted by the MET and WWF, it puts a lot of challenges in the road for a proper development program. The period is just too short for an operator to invest capital and to recover it before the tender period expires. On the other hand if the operator takes his chance and develops the conservancy as it should be developed, then I assume that his lease will be extended giving the opportunity to get the capital investment back over time. And hopefully the trophy quota will be raised due to more elephant in the concession which allows for more income and profits allowing capital investment to be recovered.

However given the limitations T&C Safaris proposes the following development plan:

BLOCK A

PHASE 1

Year One of Tender - 2016

Development of Block A would take part first as there are boreholes already in this block, but they are not in working order. It is also the block that borders Nyae Nyae conservancy which gives us the biggest opportunity to attract elephant into N#a Jagna, and to get them to become resident over time.

- Four existing Boreholes marked **+1, +2, +3, +4** on the Map in Block A will be cleaned out and Solar pumps installed with a watering hole. Two holes on the eastern border of N#a Jagna**(+1, +2)** bordering Nyae Nyae, and two boreholes in the western side of Block A **(+3, +4).** We budget on N$50,000 per solar pump and panels if the boreholes still have water and just need to be repaired and a solar pump and watering hole installed. If boreholes are dry we will still invest the N$200,000 for the year by drilling waterholes close to the old ones and installing solar pumps. **Reason being that + waterholes are located in river beds which are natural feeding areas for migrating elephant bulls. So by installing waterholes here enlarges the chance for migrating elephant bulls to smell the water while feeding in the riverine area so that they can discover the watering holes, use them and get used to them being permanent.**
- **Hence a Total of N$200,000 for 2016 will be invested**

PHASE 2

Year Two of Tender – 2017

- During this Phase Two strategic waterholes will be drilled in Block A. Depending on where the most elephant activity is the two holes will be drilled and solar pumps and watering holes installed. Our budget is N$125,000 per waterhole. Possibilities are Numbers **1, 2, or 3** on the map. **Reason being that numbers 1 & 2 is river beds which is natural feeding areas for migrating elephant bulls. So by installing waterholes here enlarges the chance for migrating elephant bulls to smell the water while feeding in the riverine area so that they can discover the watering holes, use them and get used to them being permanent.**
- **Hence a Total of N$250,000 for 2017 will be invested**

PHASE 3

Year Three of Tender – 2018

- During this Phase another Two strategic waterholes will be drilled in Block A. Depending on where the most elephant activity is the two holes will be drilled and solar pumps and watering holes

installed. Our budget is N$125,000 per waterhole. Possibilities are Numbers **4, 5, or 6** on the map. Number 5 waterhole is once again a riverine area which enhances the chance of elephant to bump into the waterhole. However now we go one step further and install watering holes **4,** and **6** in a "dead" zone where there may never have been even temporary water due to the Kalahari sand. With watering holes **1, 2, 5,** and **+ 3**, and **+ 4** having permanent all year water elephant will start wondering into this previously "dead "zone and back to the watering holes they know –numbers **1, 2, 5**, and **+ 3**, and **+ 4** to drink**.** Eventually they will discover watering **holes 6**, and **4** and the whole block will start to be utilized by migrating elephant which will over time turn into resident elephant.

- **Hence a Total of N$250,000 for 2017 will be invested**
- We will **drill Boreholes** and **install Solar Pumps** with watering holes – please see Development & Management plan outlay.

- **Transportation** is very important for the community due to the remoteness of the conservancy in the Bushmanland. However Wildlife Water Points is also a very high priority! Thormahlen & Cochran Safaris undertakes to let the N#a Jagna conservancy choose between either the Drilling of boreholes for Wildlife Water points, or a Vehicle in one of the three years. It is a difficult choice because the community may need a vehicle to transport community members, but on the other hand the only way we can develop the trophy hunting concession is by installing wildlife water points to attract elephant and other game into the conservancy.

- However, in the event that MET decides to enlarge the trophy quota, or if a Problem Elephant comes up and we sell it to a hunter, we undertake into buying of **a vehicle** for the conservancy. In the event of **a Problem elephant** we undertake to buy the vehicle in that year with the money made from hunting the bull with a foreign hunter, while we still proceed with the Wildlife Water Point Development & Management Plan. We do not encourage the declaring of a problem elephant just for the sake to buy a vehicle for the community! In the event that an elephant becomes a problem we undertake to use the funds made from the selling of that specific bull to buy a community vehicle.

- If there is a need for **a Satellite Dish & Television**, we undertake to buy a television with Satellite TV for the community hall as recreation, if a Community Hall does exist. If there is no **Nampower** we will also install **a Solar Power system with Batteries** for the community.

- If a **Community Hall** does not exist T&C Safaris undertakes to liaise with the N#a Jagna community into the building of a Community Hall if we are the successful bidder and we get another 2 years extension on the lease, so that we have a Five Year Contract..

- We will **Train and Sponsor the Training** of the members of the community as specified.

- In the event that the community needs **Salt Blocks** for their Cattle & Goats T&C Safaris will buy one ton of Salt Blocks per year for the community cattle.

- Training of the appointed Tracker to become **a Hunting Guide** in Year 3 (hence in October of the second year he will be sent to the hunting academy) of the Contract by sending him to the Volker Gruellmann Hunting Academy. The reason for sending him to the hunting academy in year 3 is for the member to gain hunting experience – on elephant, as well as baiting and hunting of leopard. It will be fruitless to send the member to the hunting academy if he has no trophy hunting experience. T&C Safaris undertakes to utilize the community member Hunting Guide so that he gain experience to become a master Hunting Guide and eventually a PH. With enough experience and if the potential exists the member could eventually qualify as a Big Game PH.

- When the N#a Jagna appointed Tracker qualifies T&C Safaris will appoint another **Tracker** in the community so that a Total of Six community members are permanently employed from year 3 onwards

- **Trophy Hunting Camp** will be built to conduct hunts from. Camp will consist of One Guest tent with en-suite bathroom, one Dining Tent / Lapa, one Kitchen tent, One Manageress / PH tent (tent will be divided in half to accommodate separate rooms), one PH /manageress Bathroom, and Five Staff Tents. A Skinning Area & Salt Room will be built for trophy skins. In the event that the Trophy Hunting Quota is enlarged a Second Guest Tent will be erected. The permanent fixed structures in the trophy hunting camp will become the property of the N#a Jagna community after the 3 year contract expires. In the event that our lease is extended we will negotiate with the community to Pay Rent to the community.

- **Donating of school supplies**. Our foreign hunting clients bring school supplies on a regular basis to Namibia – pencils, rubbers, etc.

3 SCHEDULE 5A

Envisaged Employment and Salaries:

Type of Local Staff To Be Employed	Estimated Number To Be Employed	Estimated Duration of Employment (please specify the number of days.)	Estimated Salary per Time of Employ (days)
Camp Staff- Trainee Chef/Manager-Female	1	365 days/12 months	N$65.75 p day/N$2000 p month
Skinner-Male	1	365 days/12 months	N$65.75 p day/N$2000 p month
Tracker-Male	1	365 days/12 months	N$65.75 p day/N$2000 p month
Other 1. Camp Attendant-Male	1	365 days/12 months	N$65.75 p day/N$2000 p month
2. Camp Lady -Female	1	365 days/12 months	N$65.75 p day/N$2000 p month
3.			

4 THE OPERATOR SHALL PROIVIDE FOOD TO ALL THE STAFF DURING THE PERIOD WHEN THEY ARE ON DUTY

5 SCHEDULE 5B

Types of training by operator:

Number of Local People to be Trained	Types of Training To Be Provided	Estimated Length of Training	Proposed Training Site	Commencement of training
1	Chef/Manager training	12 months (see below)	Windhoek Politec and in camp	Feb /March 2016
1	Tracker	See below		March 2016
1	Skinner	See below		March 2016
1	Camp Attendant	12 months	In house training	March 2016
1	Camp Lady	12 months	In house training	March 2016

6 **SCHEDULE 6**

7 **DOMICILIUM CITANDI ET EXECUTANDI**

The Conservancy: ……..:

……

……

……

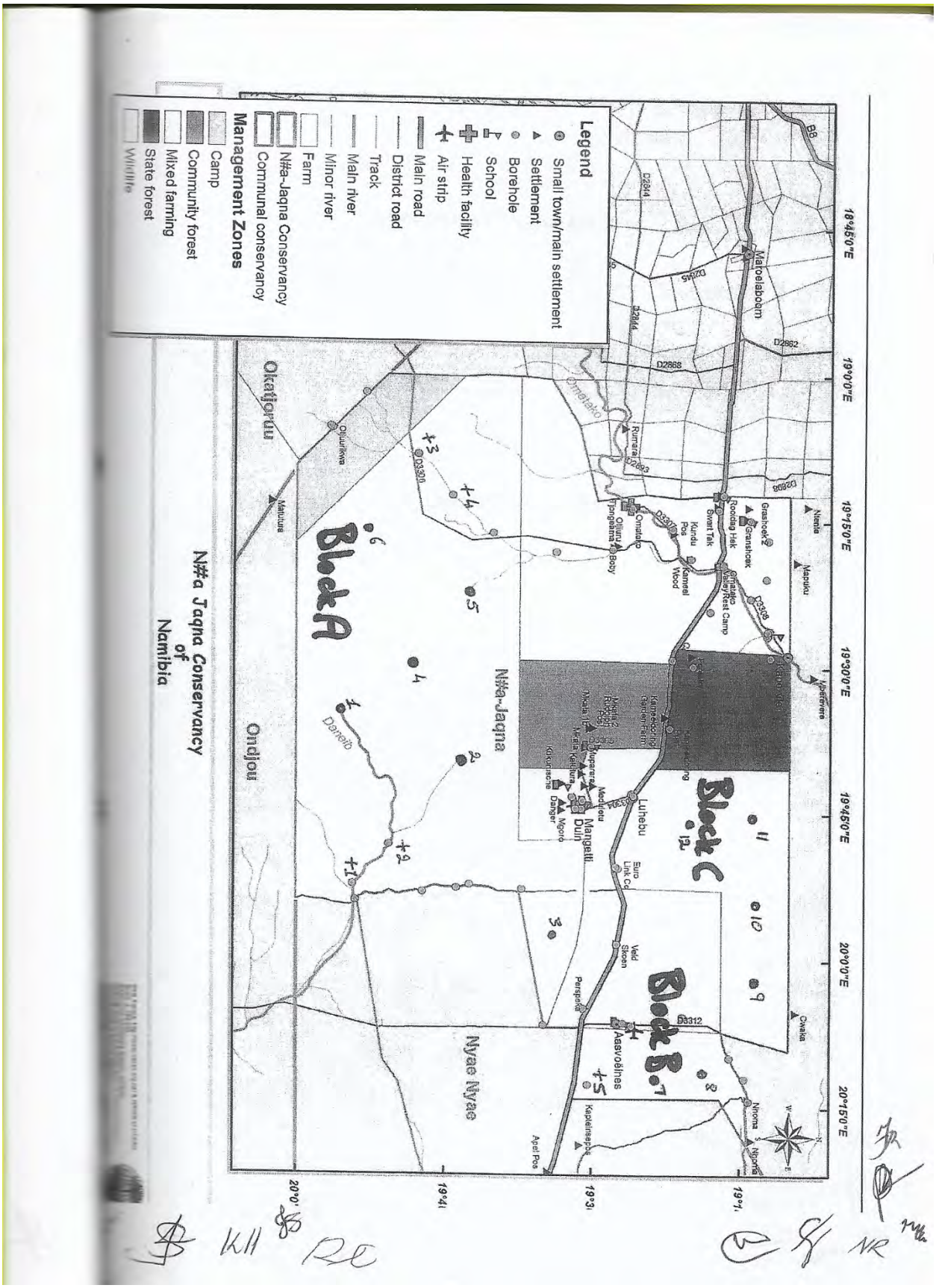
The operator: ……...

……

……

……

……


Legend
Small town/main settlement
Settlement
Borehole
School
Health facility
Air strip
Main road
District road
Track
Main river
Minor river
Farm
N‡a-Jaqna Conservancy
Communal conservancy
Management Zones
Camp
Community forest
Mixed farming
State forest
Wildlife
N‡a Jaqna Conservancy
of
Namibia
Block A
Block B
Block C
N‡a-Jaqna
Ondjou
Okatjorutu
Nyae Nyae
Mafoelaboom
Luhebu
Mangetti Dun
Aasvoelnes
Kapkeinsepos
Nhoma
Owaka
Maputu
Nlanla
Grashoek
Omatako
Kurdu Pos
Kameel Wood
Oliuru Tripgsana
Oliuurikwa
Rumarai
Omatako
Matjuna
Darneib
Veld Skoen
Euro Link Cd
Pengeleni
Apel Pos
Moord Danger
Kuparara
Mbura Ridge
Mbura 2 Ridge
Kamanjab Game Farm
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19°0'0"E
19°15'0"E
19°30'0"E
19°45'0"E
20°0'0"E
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D2862
D2868
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D3306
D3308
D3310
D3312
D3320

Barry, Anna <anna_barry@fws.gov>

Danny Spindler PRT #28045C

Barry, Anna <anna_barry@fws.gov> Tue, Apr 30, 2019 at 11:48 AM
To: Danny Spindler (b) (6)

Dear Mr. Spindler,

Thank you for your e-mail message below, the additional information was placed in your file.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

---------- Forwarded message ---------
From: **Danny Spindler** <(b) (6)>
Date: Mon, Apr 29, 2019 at 3:16 PM
Subject: [EXTERNAL] RE: Danny Spindler PRT #28045C
To: Barry, Anna <anna_barry@fws.gov>
[Quoted text hidden]

N#a Jagna Conservancy-USF&W Operator Enhancement Report-Update 4 April 2019.docx
5475K

BISON CONNECT

Barry, Anna <anna_barry@fws.gov>

Danny Spindler PRT #28045C

1 message

Barry, Anna <anna_barry@fws.gov> Thu, Jun 6, 2019 at 2:04 PM
To: Danny Spindler (b) (6)

Dear Mr. Spindler,

Currently all of the applications within our office for the import of a elephant trophy are pending. Most of the African lion applications are gradually being finalized.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Wed, Jun 5, 2019 at 2:27 PM Danny Spindler (b) (6) > wrote:

> Ms. Barry
>
> I hope this email finds you well.
>
> It has been awhile since we last spoke. Is there any movement on the processing of the renewal permits from Namibia? Are any of the big five animals in Namibia being processed for import into the U.S.? I heard USFWS was now processing Lion and would start on the elephants next, but you know how rumors are.
>
> Thank you for your me.

Barry, Anna <anna_barry@fws.gov>

Danny Spindler PRT #28045C

1 message

Barry, Anna <anna_barry@fws.gov> Mon, Aug 26, 2019 at 10:23 AM
To: Danny Spindler (b) (6)
Bcc: Mary Cogliano <mary_cogliano@fws.gov>

Dear Mr. Spindler,

All applications for the import of an African elephant trophy are currently pending.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Fri, Aug 23, 2019 at 1:58 PM Danny Spindler (b) (6) > wrote:

> Dear Ms. Barry,
>
> I am just following up to see if there has been any movement on my renewal Permit # MA-28045C-0. I know we are approaching the 1 ½ year mark since I applied.
>
> Thank you for your me and ha ve a great weekend.

Danny M. Spindler

Email: (b) (6)
(b) (6)

Evansville, IN 47715

(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 DEC 05 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ham	Garrett	Scott	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name		

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Sahuarita	Az	85629	Pima	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 156171 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my kn[redacted] that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature of a[redacted] permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 11-29-2017

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:_____(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:

   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:

      S17 56'3.77" E23 44'7.63" Sobbe Camp Katima Mulilo, Namibia

   b. Date wildlife was hunted: Hunted March 18th. Through April 8th 2016

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

      Tanned skin and ears, Tusks, Finished foot stools, Hair, 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]:

      Yellow Shark Holdings
      PO 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].

Name: Business	Yellow Shark Holdings
Name: Address:	PO Box 81413, Olympia
Address:	Windhoek, Republic of 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. 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: 11-29-2017

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):

Garrett Ham
(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.

Ndumo Safaris (Namibia) motivational letter for Enhancement permits for elephant and leopard imports into the USA:

Ndumo Safaris Ltd is a northeast Namibia based outfitter striving to combine sustained big game hunting with a focus on wildlife conservation within 3 vast concessions 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 hunting quotas on 3 hunting blocks.

This communal conservancies' model of adopted by Namibia, especially those with a hunting quota awarded, works very well in helping local, impoverished communities to:

1) Co- exist on land that has elephants and leopard on them
2) Derive an income from the animals that occur on their communal land, sometimes on land that is not really suitable for eco-tourism
3) Create core hunting areas where no or very few livestock enters, thus creating a wildlife only zone
4) Create buffer zones around dedicated National Parks and human habitation
5) Decrease human/ wild game conflict
6) Create employment opportunities for local communities
7) Provide local communities, that are often live below the bread line, with much needed protein in the form of game meat
8) Create funds for these communities to do their own anti-poaching
9) Create funds for the Game Products trust fund, which helps them in developing the areas for wildlife, compensate them for wildlife conflicts and educate them on the value of wildlife in the area.

Currently, we own and operate the following concessions in the Caprivi / Zambezi region of Namibia:

- Sobbe communal conservancy
- Sikunga communal conservancy
- The joint venture area called 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 Kyaramachan 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 per annum.

We currently employ 33 people from the region, paying them around double what the minimum requirements are. These jobs thus support 33 families from the region, where any type of permanent employment is scarce.

We further provide over a 100 metric tonnes of meat to the local communities per annum, in the form of game meat from the animals harvested.

Barry , Anna <anna_barry@fws.gov>

Garrett Ham PRT #66279C

6 messages

Barry , Anna <anna_barry@fws.gov> Tue, Apr 24, 2018 at 5:18 PM
To: (b) (6)
Bcc: Luis Rivera <luis_rivera@fws.gov>

Dear Mr. Garrett Ham,

The following is in response to your phone call received earlier today.

In response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service is revising its procedure for assessing applications to import certain hunted species like African elephants. We are withdrawing our countrywide enhancement findings for a range of species across several countries. In their place, the Service intends to make findings for trophy imports on an application- by-application basis. Please be aware that we continue to seek additional information directly from the relevant foreign Government Authorities to support our permit findings, therefore, applications are still under review.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT You may have noticed that our application forms expired 5/31/2017 . The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Garrett Ham <(b) (6)> Tue, Apr 24, 2018 at 6:28 PM
To: "Barry, Anna" <anna_barry@fws.gov>

Anna, thanks for the update. I really appreciate your quick reply. I know you don't know an exact time frame for issuing permits again but I am trying to make a decision on what I should do with my trophy. Do you think it will be more than six months? The trophy Is currently sitting in Namibia and I am paying storage fees. My question to you is, if I export the trophy to South Africa to get started on some of the taxidermy (I want to make some leather products out of the currently tanned leather). Upon completion assuming I get my permit I would then export it from South Africa to the United States. Can I do this? And if so do I need to modify my current Cites permit that you have currently to review?

Thanks,
Garrett Ham
[Quoted text hidden]

Barry , Anna <anna_barry@fws.gov> Wed, Apr 25, 2018 at 9:58 AM
To: Garrett Ham (b) (6)

Dear Mr. Ham,

If the trophy will be exported from South Africa then you would want to provide us the address of the shipping company in South Africa. If you are not sure of the address at this time then I can put a note in the file to contact you before finalizing your application to confirm the shipping address. Unfortunately, I am not sure of the time frame for finalizing these applications.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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[Quoted text hidden]

Garrett Ham (b) (6) Wed, Apr 25, 2018 at 10:24 AM
To: "Barry, Anna" <anna_barry@fws.gov>

Thank you

Thanks,
Garrett Ham
[Quoted text hidden]

Garrett Ham (b) (6) Wed, Apr 25, 2018 at 1:43 PM
To: "Barry, Anna" <anna_barry@fws.gov>

Please do note the file to contact me. Since it doesn't seem to be a problem to move the Elephant trophy from Namibia to South Africa for Taxidermy work then on to the US I may as well use this down time to get the work done. Thanks again for your quick feedback.

Thanks,
Garrett Ham
[Quoted text hidden]

Barry , Anna <anna_barry@fws.gov> Wed, Apr 25, 2018 at 2:22 PM
To: Garrett Ham (b) (6)

Ok, but just remember, if the trophy will be shipped from South Africa then the permits must show an U.S. and South Africa address. If the trophy is being shipped from Namibia, then the permits must show an U.S. and Namibia address.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
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On Wed, Apr 25, 2018 at 1:43 PM, Garrett Ham (b) (6) wrote:

> Please do note the file to contact me. Since it d roblem to move the Elephant trophy from Namibia to South Africa for Taxidermy work then on to the US I may as well use this down time to get the work done. Thanks again for your quick feedback.
>
> Thanks,
> Garrett Ham
>
> On Apr 25, 2018, at 6:58 AM, Barry, Anna <anna_barry@fws.gov> wrote:
>
> > Dear Mr. Ham,
> >
> > If the trophy will be exported from South Africa then you would want to provide us the address of the shipping company in South Africa. If you are not sure of the address at this time then I can put a note in the file to contact you before finalizing your application to confirm the shipping address. Unfortunately, I am not sure of the time frame for finalizing these applications.
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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

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

Federal Fish and Wildlife Permit Application Form

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

RCVD DEC 15 2017

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

Type of Activity:
Import of Sport-hunted Trophies 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
KOBRIN	BRUCE	NICHOLAS	

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

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

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Las Vegas	Nevada	89117	CLARK	U.S.A

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the ...ement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

...it (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 12/12/2017

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 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:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: SOUTH AFRICA. GPS CO-ORDS IS 24 DEGREES 15' 35.40" SOUTH AND 30 DEGREES 55' 06.89" EAST. AREA/REGION OR PROVINCE IS LIMPOPO PROVINCE. CLOSEST TOWN OR CITY IS Hoedspruit
   b. Date wildlife is to be hunted: MARCH 19th THRU MARCH 26th 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, TUSKS, TAIL, feet, ears

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):
SKINS TUSKS TAIL 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 document]:
SOUTH AFRICA, TOWN OR CITY IS Hoedspruit

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: RUPERT DeDeKind
Business Name: UNIVERSAL TROPHY SERVICES
Address: PLOT 114 BASHEWA, PRETORIA 0056
Address:
City: PRETORIA
State/Province: SOUTH AFRICA
Country, Postal Code:

SAFARI AIR Cargo System
34 5th AVE BRADELL A.H.
Kempton ~~Park~~ PARK
1619
Phone 011 979-3770

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: 12/11/2017

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 will use
FAUNA AND FLORA, A division of MIA Logistics
152-31 135th Avenue, Jamaica, New York 11434
FAX 718-276-3300

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 Listed

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 Red KOBRIN (b) (6) Las Vegas, Nevada
(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.

MacDonald, Tim <tim_macdonald@fws.gov>

U.S. Fish and Wildlife Service Prt # 69349C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Fri, Aug 23, 2019 at 9:58 AM
To: (b) (6)

Bruce Kobrin,

On **12/15/2017** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **(Prt # 69349C)**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

RCVD APR 25 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Blake	James	Andrew	

(b) (6) [redacted]

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room # as P.O. Box): (b) (6) [redacted]

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Kasilof	Alaska	99610	Kenai	USA

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

(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Kasilof	Alaska	99610	Kenai	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 [illegible] and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

4-17-2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

(b) (6) [redacted]

James Blake

Lake Havasu, AZ. 86406

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

James A. Blake (b) (6) [redacted]

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

(No) Yes

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name. 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:
   Zeekoepan Game Farm P.O. Box 696 Pongola 3170
   Magudu Vergelegen Farm 639 R69 Magudu
   District Paulpietersburg Province=KwaZulu-Natal

   b. Date wildlife is to be hunted: April 1 2018 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: NA
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?

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: N/A Date: _____

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

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

Applicant's signature: (b) (6) 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).

EZEMVELO KZN WILDLIFE
Conservation, Partnerships & Ecotourism

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	*(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

(b) (6)
Permit Holder

EZEMVELO KZN WILDLIFE

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

(b) (6) [redacted]

Permit Holder

EZEMVELO KZN WILDLIFE

Conservation, Partnerships & Ecotourism

ORIGINAL

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

Permit No: OP 1121/2018
Contact: Miss S.M. Hughes

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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

(b) (6)

Permit Holder

EZEMVELO KZN WILDLIFE

Conservation, Partnerships & Economies

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

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   (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
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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

(b) (6) [redacted]

Permit Holder

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Wed, Oct 2, 2019 at 11:17 AM
To: (b) (6)

U.S. Fish and Wildlife Service Prt # 86987C

On 04/25/2018 an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt #** 86987C. At the me of the applic aon' s submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

RCVD APR 19 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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Lipworth	Alexander	J	

(b)(6) [redacted]

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

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

Section C: All applicants complete address information

1.a. Physical address (Street add (b)(6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Opa Locka	FL	33054	Miami Dade	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) [redacted] 4/17/2018

Please continue to next page

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

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

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

Note 2: If you hold an import permit for 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 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)?

(b)(6) [redacted]

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. 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 Age 5 years

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:

   Namibia, NYAE NYAE Conservancy, otjozondjupa region

   b. Date wildlife was hunted:

   23 October 2017

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

Stefan M Jacobs
SMJ 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]:

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. If you are applying to import a 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, PO 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?

N/A

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

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: (b) (6) 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).

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.J. Hipworth

Residential Address:

Country: U.S.A

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

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
I	Crocodile	
	Dik-dik	
	Eland	2x
I	Elephant	1x
	Giraffe	
	Grey Duiker	2x
II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	2x
II	Lechwe	
	Oryx (Gemsbok)	2x
	Ostrich	2x
	Red hartebeest	1x
	Reedbuck	
I	Rhinoceros, black	
I	Rhinoceros, white	
	Roan	1x
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	1x
	Warthog	1x
	Waterbuck	
	Wildebeest, blue	2x
	Zebra, Burchell's	
II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
I	Cheetah	
I	Leopard	
II	Lion	
	Other	
	*Report back within 48hrs after hunt	

on the following farms / hunting concessions: Nyae - Nyae Conservancy

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

MINISTRY OF ENVIRONMENT & TOURISM
Rebecca R. Hebes
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.

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) 175 477

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
23/10/17	Elephant		30,4kg		26,8kg			45	M.	Nyaw Nyaw Cons.			(b) (6)	

Form 3-200-20

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

DEC 4 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Botts	Michael	Richard	Mr.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number
(b) (6) [redacted]	

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, P.O. Box)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Durango	Colorado	81303	La Plata	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

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted] 6/26/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

Michael R Botts
(b) (6) [redacted]
Durango, CO. 81303

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

Michael R Botts
(b) (6) [redacted]

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

☒ No ☐ Yes

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

N/A

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   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:
   Zimbabwe, Mokore Ranch, Save Valley Conservancy

   b. Date wildlife was hunted:
   April 27TH → May 8TH

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

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 stable Close
Off Hunt Road
Borrowdale
Harare, Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

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

Name: Tammy
Business Name: Coppersmith
Address: 114 Southfield Parkway, Suite 170
City: Forest Park
State/Province: Georgia
Country, Postal Code: 30297

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 documents

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?
$15,000 trophy fee - landowner & government fees
$20 per day per hunting client - conservation fees

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
Mokore Safaris has implanted and fully funded anti-poaching units in their areas. See their website for more information, http://www.mokoresafaris.com/conservation.html

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: _____

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 signatur[redacted] Date: 6/26/18

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).

Estimated Grazing Units

GC={(-0.03)+(0.00289)(x1)}+(x2-419,7)(0.000633)

Where: x1 = Veld Condition Score (VCS)
Where: x2 Mean Annual Rainfall

GC = {(-0.03)+(0.00289)(50,5)}+(500-419.7)(0.000633)

0.165LAU/ha OR 6ha/LAU (Large Animal Units)

Total Study Area: 157200ha

157200 ÷ 6ha/LAU
Estimated LAU for study area 26 200

LAU conversion to Grazing Units (180kg wildbeest)
26 200 ÷0.5 estimated 52 400 Available Grazing Units

Current stocking ratios*
Bulk Feeders:Selective Feeders:Mixed Feeders:Browsers
32% : 1.2% : 57% : 10%

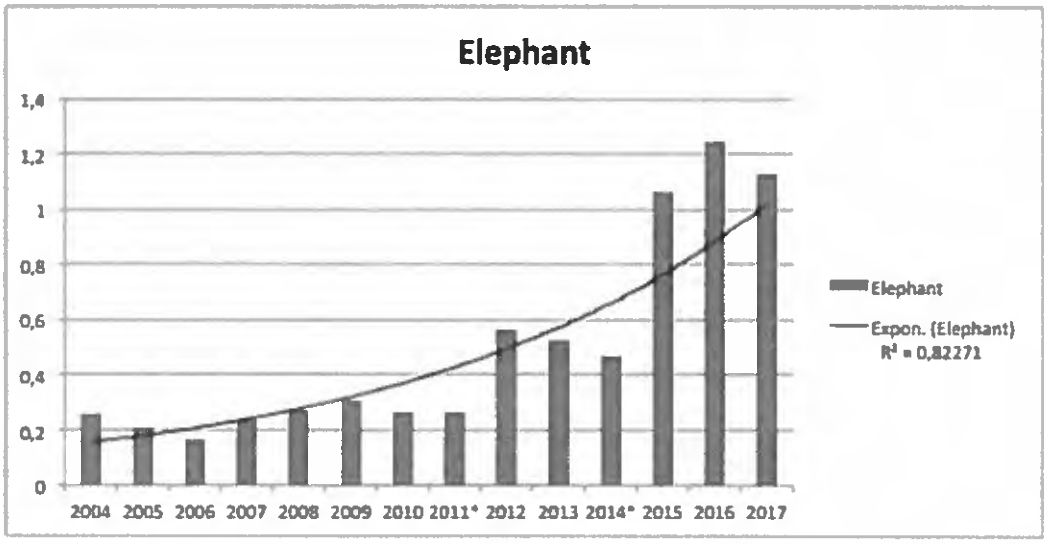
Grazing Units per feeding group
13 023 : 494 : 22993 : 4005
Total: 40515

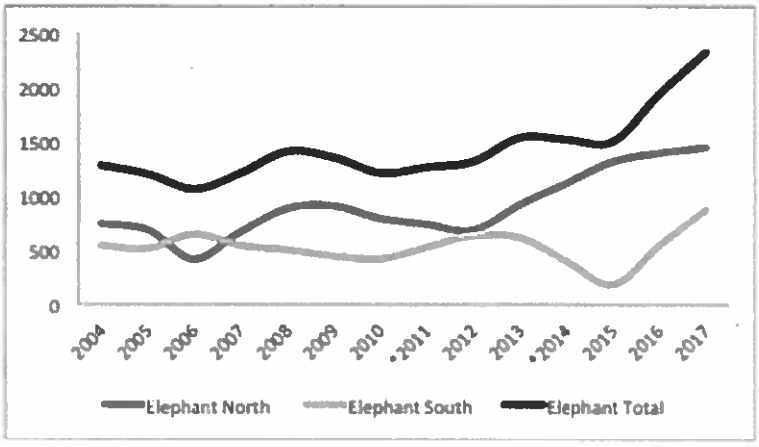
Balance of 11 885 GU
Ideal Stocking Ratios
Bulk Feeders:Selective Feeders:Mixed Feeders:Browsers
45 : 20 : 20 : 10

Thus if Stocking Ratios are adjusted, main focus on Mixed Feeders
Impala off-take @ 30% = 1565 GU
Elephant off-take @20% = 2920 GU

Estimated that grazing pressure would be reduced

*Considering Major Ungulates foundwithin SVC


Elephant
1,4
1,2
1
0,8
0,6
0,4
0,2
0
2004 2005 2006 2007 2008 2009 2010 2011* 2012 2013 2014* 2015 2016 2017
Elephant
Expon. (Elephant)
R² = 0,82271


2500
2000
1500
1000
500
0
2004
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2011
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2014
2015
2016
2017
Elephant North
Elephant South
Elephant Total

RCVD JAN 24 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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Sanson	David	B	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			
5.a. Telephone number	**5.b. Alternate telephone number**	**5.c. Fax number**	**5.d. E-mail address**
(b) (6)			(b) (6)

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

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

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Walnut Creek	CA	94596	Contra Costa	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Concord	CA	94520	Contra Costa	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applica(b) (6) 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of m false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

1/12/18

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: 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: 10/13/2017 - Concession - N#a Jagna Conservancy, Closest town is Tsumkwe. Namibia, Bushmanland Region, GPS coordinates - S 19 11 47.6 / E 020 04 17.0
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      skin, 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]:

      Caspers Taxidermy, Industrial Area, Grootfontein, Namibia / P.O. Box 1322 Grootfontein, 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:	Caspers Taxidermy
Address:	Industrial Area (P.O. Box 1322, Grootfontein, Namibia)
City:	Grootfontein
State/Province:	Namibia
Country, Postal Code:	(Professional Hunter - Anton Mynhardt Alberts, 92 Nelson Mandela Avenue, Stillwater #5 Klein Windhoek, City of 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: _____

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) [redacted] Date: 1/12/18

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).

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):

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):

Jessica Moraes (b) (6) [redacted]

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

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

[EXTERNAL] Supplement to Import permit Application for Dave Sanson - Elephant taken from Namibia

Aimee Korver <permits@conservationforce.org>

Wed 7/29/2020 3:24 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; jjjjpad@conservationforce.org jjjjpad@conservationforce.org <jjjjpad@conservationforce.org>; (b) (6) (b) (6) >; Peter@africatrophyhunting.com <Peter@africatrophyhunting.com>

1 attachments (8 MB)

SupplementInfoDaveSanson.Namibia.Elephant.Supplement.zip;

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Ms. Brisendine,

I have attached the supplemental information for Mr. Dave Sanson's import permit application for the elephant that he took in Namibia in 2017.

We were never given a PRT #- so I wanted to send this to you directly to ensure that it gets put where it needs to go. Can you kindly provide the PRT # also when you get a chance.

Please let me know if you have any questions and that you have received this information.

Kindest Regards,

Aimée *Korver*

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233

email: permits@conservationforce.org
www.conservationforce.org

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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RENEE SNIDER

July 29th, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-MAIL: amy_brisendine@fws.gov

RE:	**PRT # ? - Elephant Import Permit Application for Namibia**
Applicant:	**Dave Sanson**

Ms. Brisendine:

Please see attached the Notice of Representation and the Import Permit application (that has been previously filed) for Mr. Dave Sanson. Mr. Sanson took an elephant in Namibia in October of 2017. We would like to submit this document, and the ones attached, as supplemental information for his import permit application.

Due to COVID-19 the trophy for this applicant was moved from the location that was on the original application.

The new information is as follows:

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

African Shipping Services, Windhoek Namibia

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

Name:
Business Name: **African Shipping Services**
Address: **46 Tv More St.**
City:State/Province: **Southern Industrial Area**
Country, Postal Code: **Windhoek, Namibia**

Professional Hunter: **Anton Mynhardt Alberts, 92 Nelson Mandela Avenue, Stillwater, #5, Klein Windhoek, City of Windhoek, Namibia.**

In order to show that this hunt enhanced and benefitted the wild elephant population in Namibia we have included the very detailed Operator Enhancement Report for the N # Jagna Conservancy, a report on the

"Growth in Agricultural Commodities: Wildlife and Tourism" provided by the Namibian Chamber of Environment, and the "Keep Namibia's Wildlife on the land!" document.

In all of these documents you will find that it is well documented and backed up with science-based evidence that regulated hunting has enhanced the elephant and wildlife population of Namibia and has also given the country and its people a commodity to help support this conservation. The Elephant population as a result is steady and growing in Namibia.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. Dave Sanson w/attachments

Enclosures:

a. Operator Enhancement Report- N#a Jagna Conservancy
b. Keep Namibia's Wildlife on the Land!
c. Growth in Agricultural Commodities: Wildlife and Tourism (Namibia)
d. Notice of Representation
e. Hunting Permits
f. Supplemental Letter with information – this letter

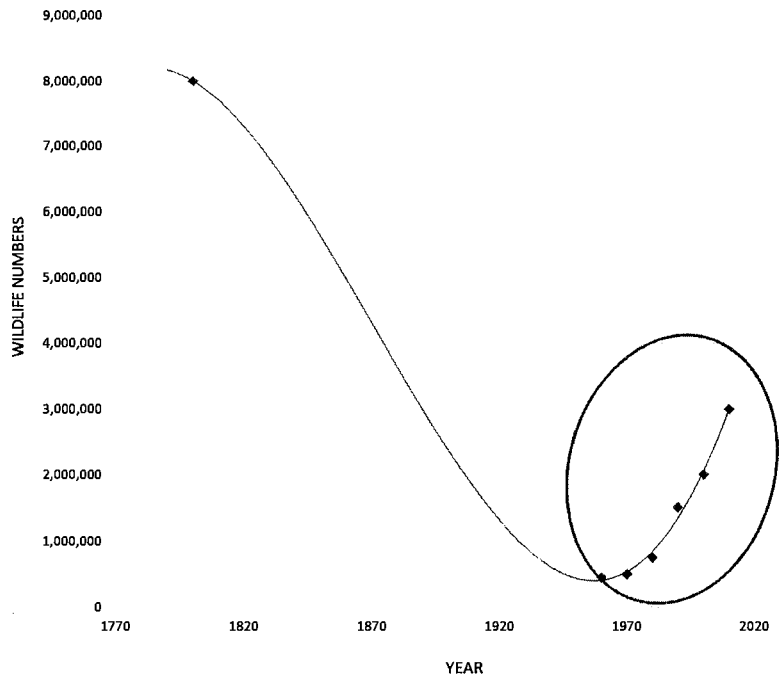
Growth in agricultural commodities:

- Wildlife & Tourism -

Chris Brown

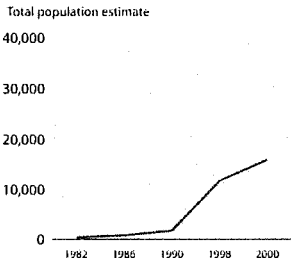
NCE
Namibian Chamber of Environment

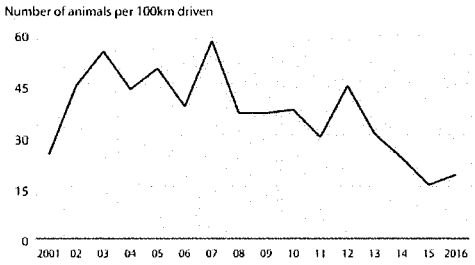
Changing wildlife number in Namibia over past 240 years



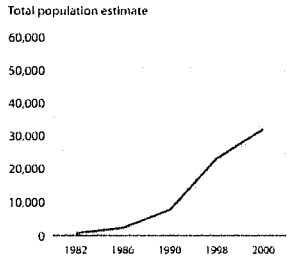
- ✓ State devolved rights over wildlife to land owners & custodians
- ✓ Wildlife became part of the rural economy
- ✓ Led to a multi-purpose wildlife economy comprising tourism, trophy hunting, meat harvesting, own use and live sale

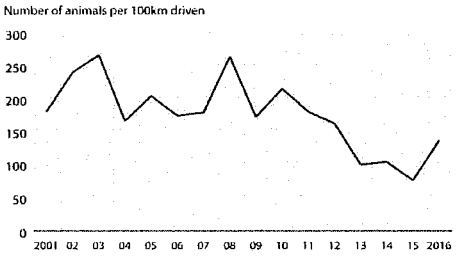
Oryx



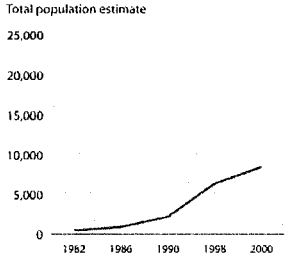


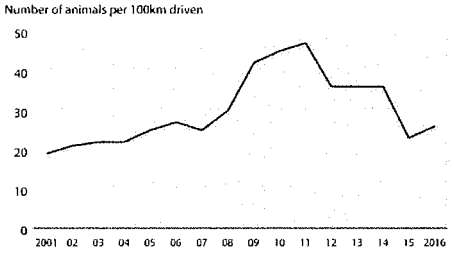
Springbok



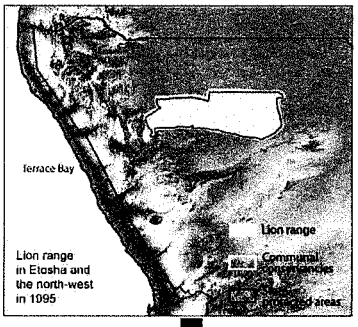


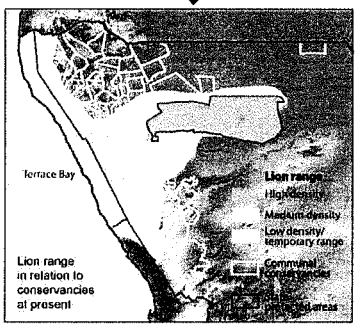
Mountain Zebra





Lion 1995 - 2015





Trends in iconic species

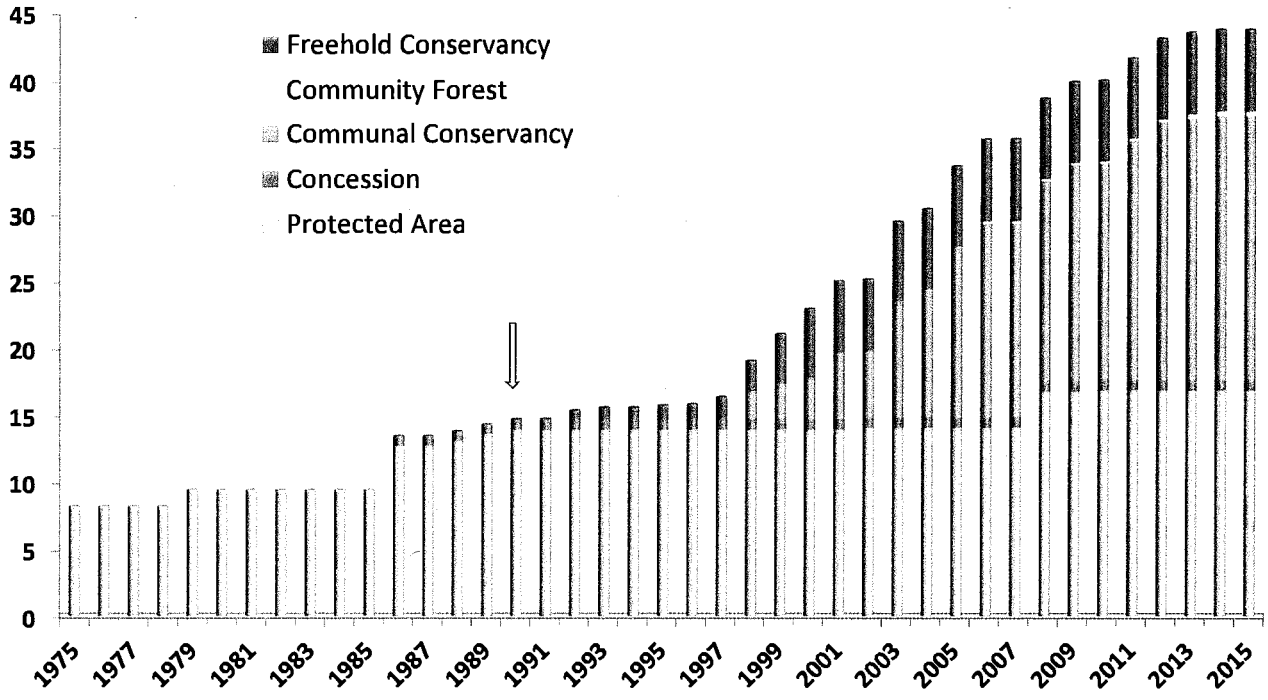
Elephant

- **1995: 7,600**
- **2017: 23,000+**

Black Rhino

- **1980: Near extinct**
- **2015: Largest national population & largest population outside state parks in world**

Land under various forms of wildlife management



Types of land management systems and percentage of country

Land under wildlife	Percent
State protected areas	18
Privately protected areas	1
Wildlife & tourism concession areas	1
Communal conservancies	20
Freehold "conservancies"	6
State & community forests	1
Registered hunting farms	4
Informal – farms using wildlife	?
Total	51+

Namibia's land-tenure systems wrt wildlife

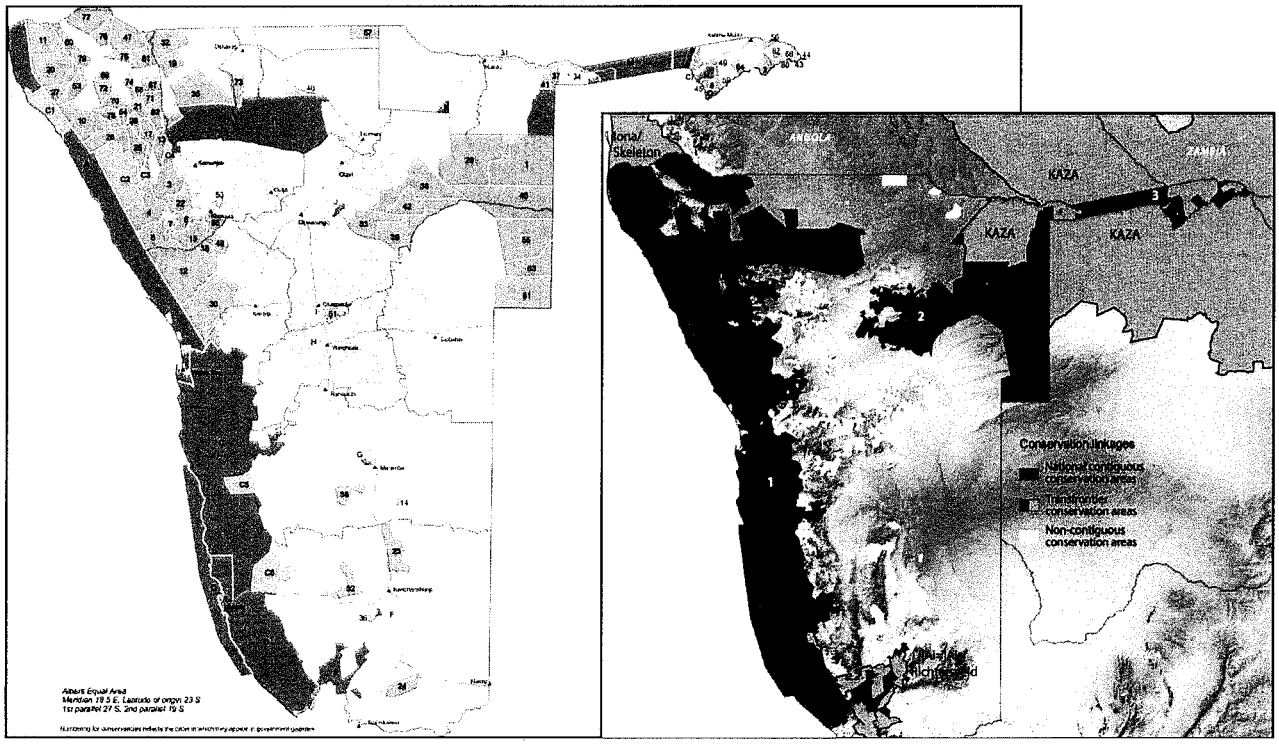
Land tenure units	Land area	Wildlife
Freehold (privately owned) land	42%	82%
Communal land	40%	12%
National Parks	17%	6%

Freehold – conditional use rights since mid-1960s – based on surveyed farms – private ownership & management

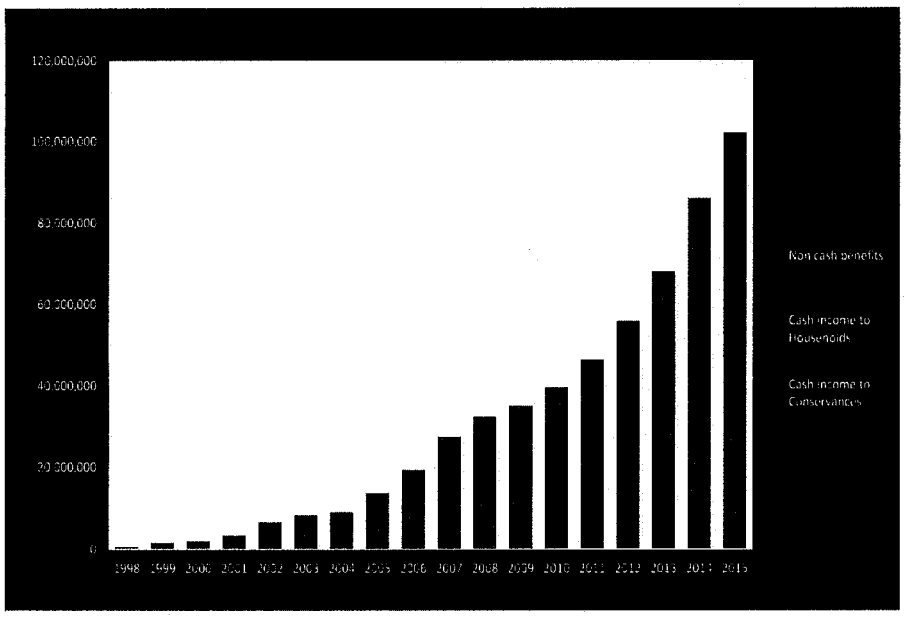
Communal – conditional use rights since mid-1990s – based on registration of a "conservancy" – communal ownership & management

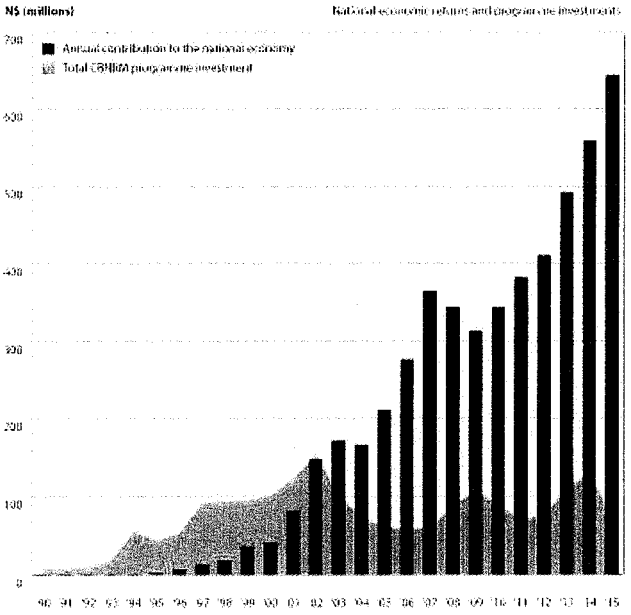
National Parks – based on Nature Conservation Ordinance – State held (on behalf of the nation) and State managed.

What this means at a landscape level

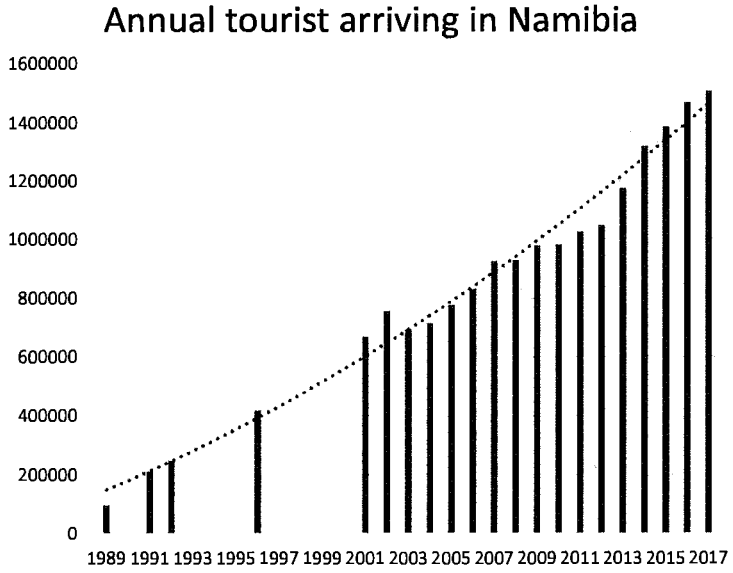


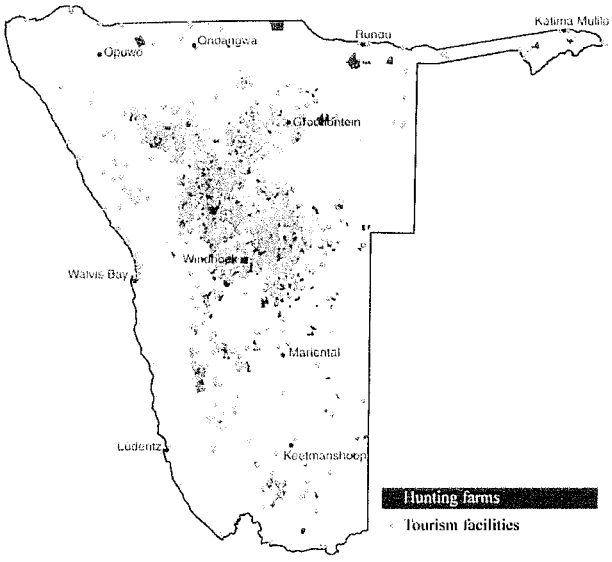
Changing contribution of wildlife on communal land …



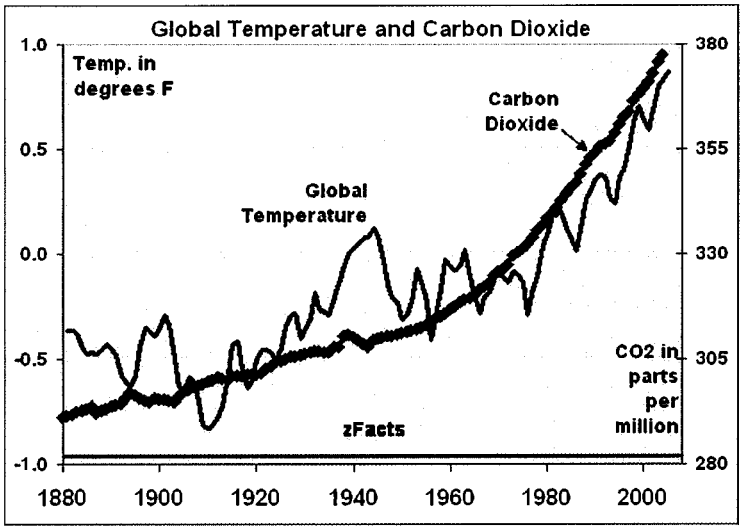


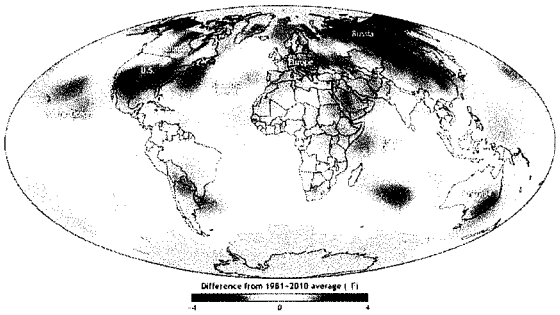
Tourism growth and distribution of tourism facilities

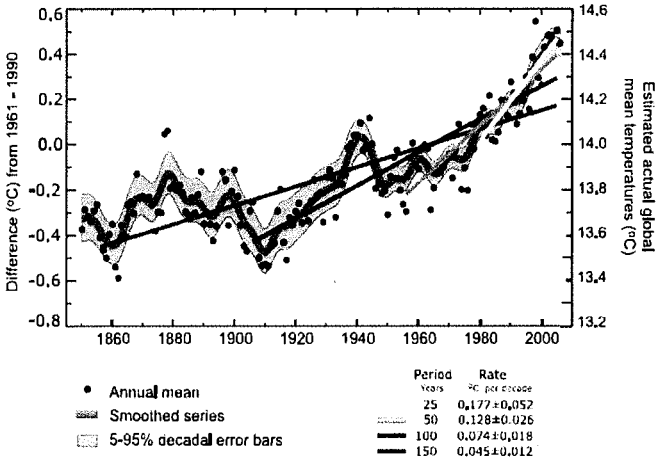




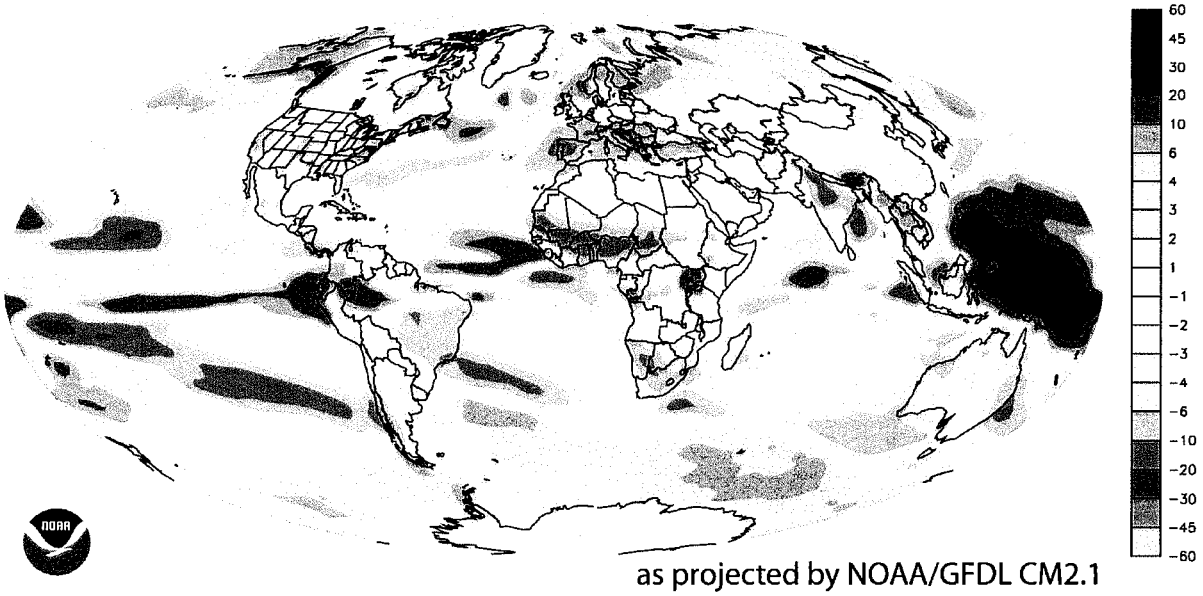
Implications of climate change on land use and productivity







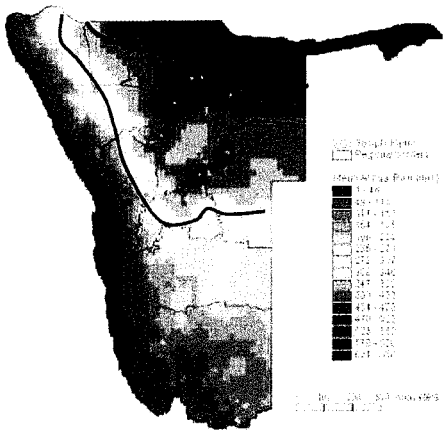
CHANGE IN PRECIPITATION BY END OF 21st CENTURY
inches of liquid water per year



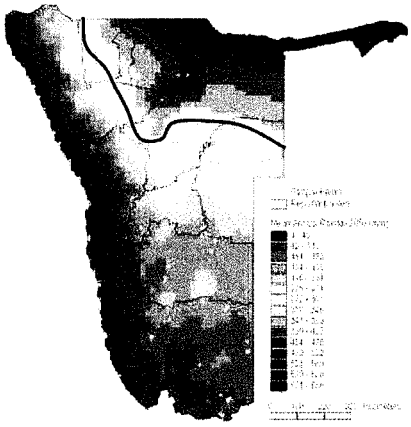
as projected by NOAA/GFDL CM2.1

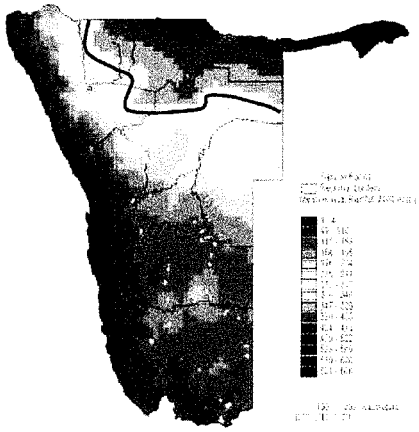
Climate change

Median Climate change projections ... (in reality – happening faster)



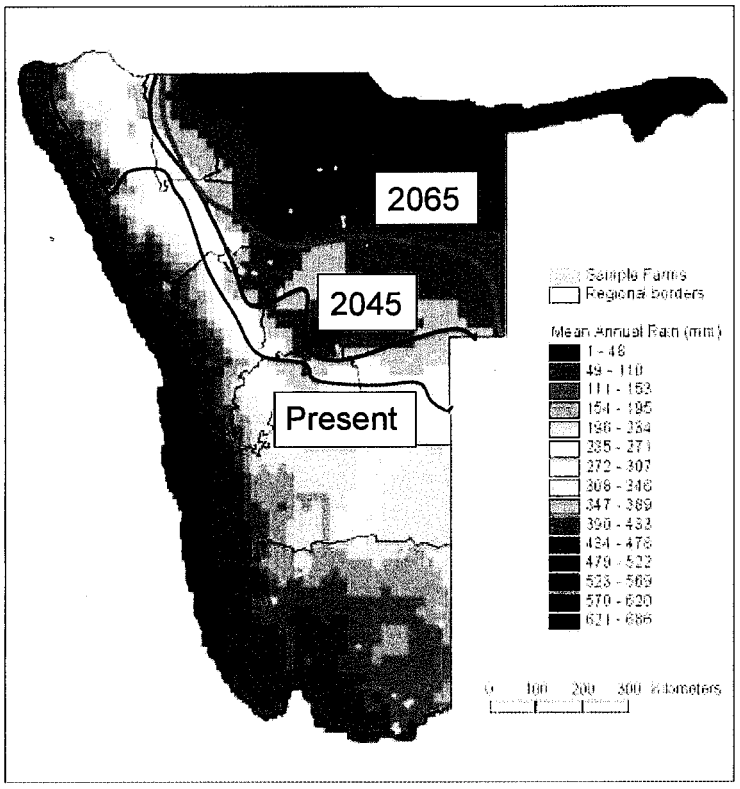
Current mean annual rainfall across Namibia



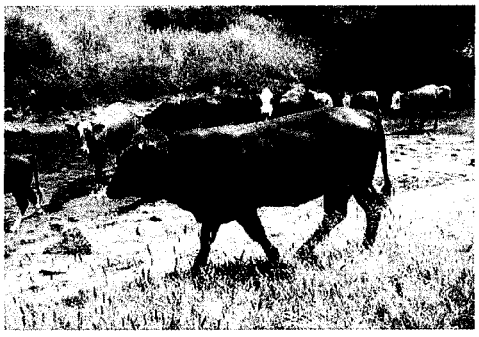


Projected mean annual rainfall across Namibia by 2045 and 2065, according to predictions generated by the HADCM3 general circulation model

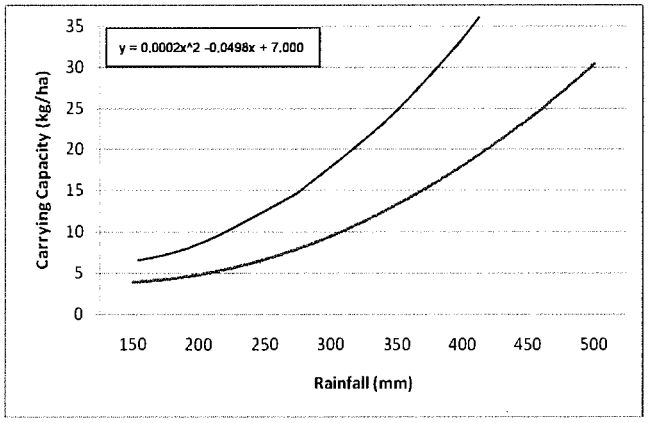
Economic viability under commercial cattle farming



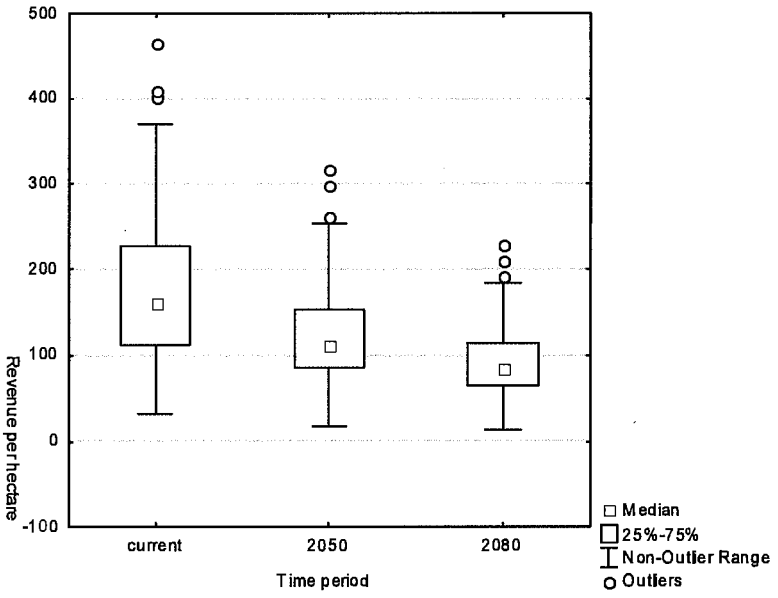
Large-stock areas lost	
By 2045	By 2065
9 million ha	**18 million ha**



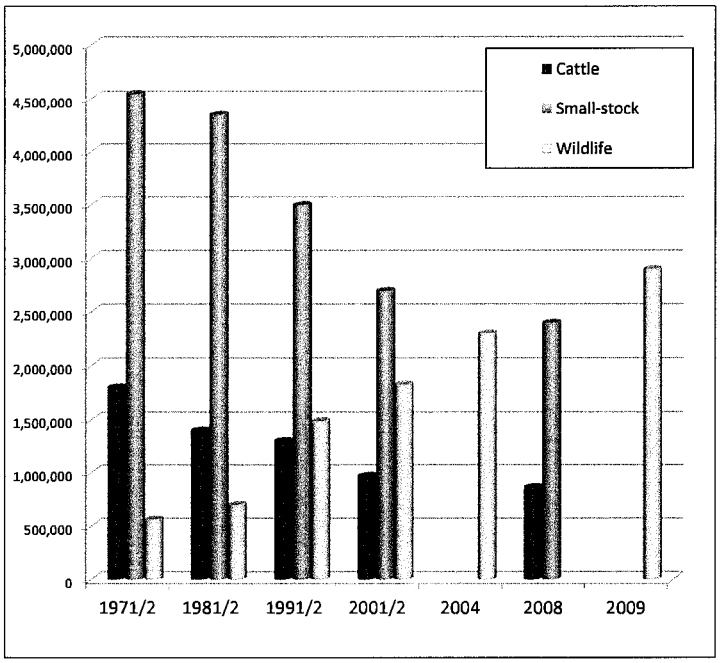
Relationship between rainfall and carrying capacity



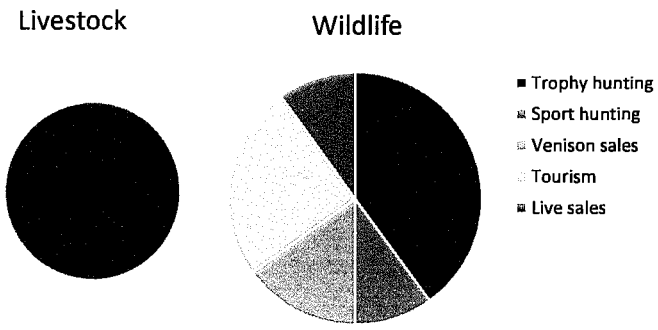
Livestock farming revenue is strongly linked to annual rainfall. 1% change in rainfall = 1.36% change in revenue: 20% decline in rainfall = 27% drop in revenue = unviable.



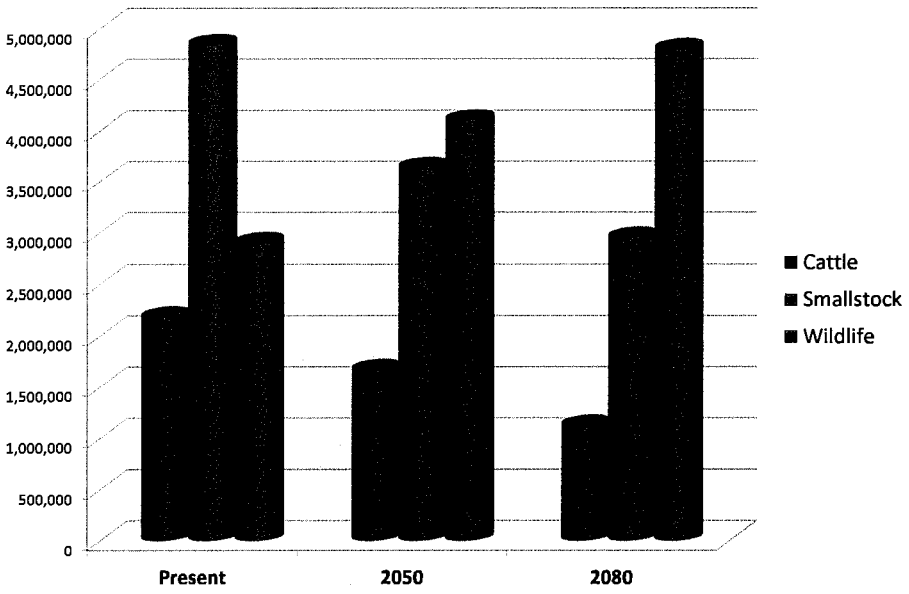
Changing contribution of livestock & wildlife on freehold land ...



Financial returns – central Namibia

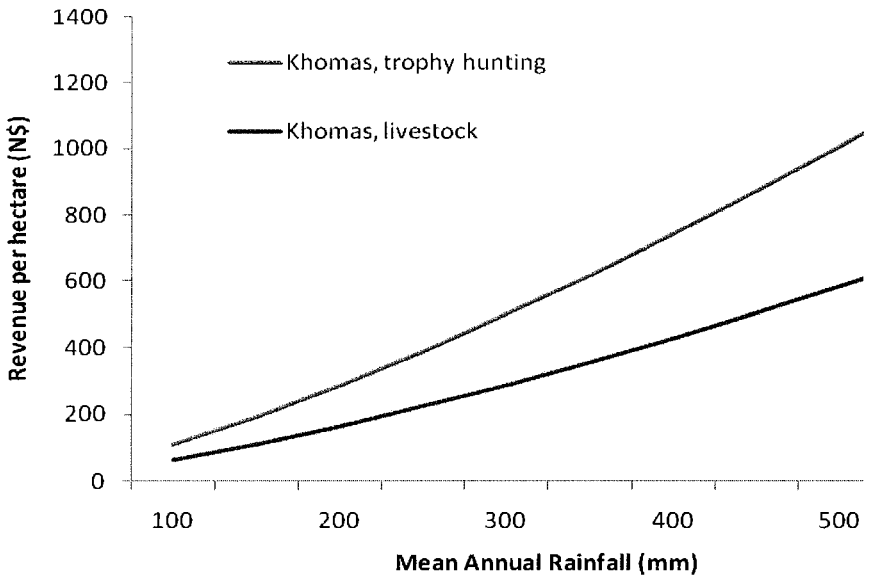


Projected livestock and wildlife numbers on freehold land in response to climate change



Trophy hunting

- Takes off about 1% of the national wildlife herd per year
- Contributes about 20% more to GDP than the small-stock sector

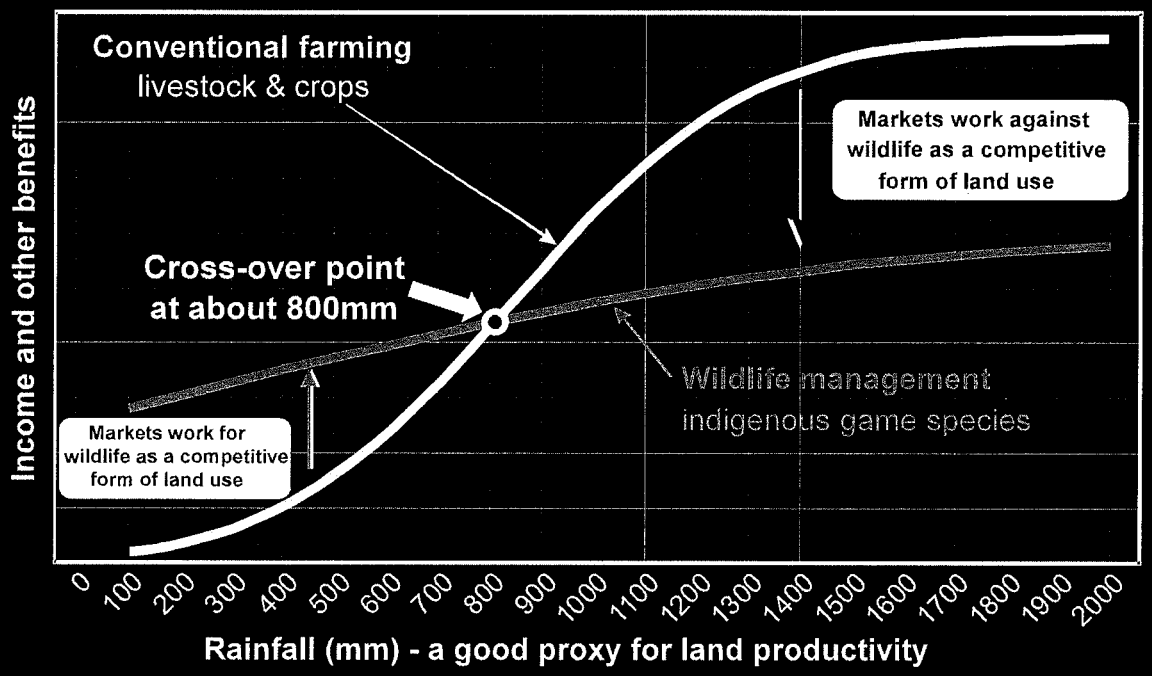


Tourism

Region	Land use	Employees per 1,000 ha	Gross Value Added (GNI) per ha (N$)	Net Value Added (NNI) per ha (N$)
Karas (Karoo)	Communal livestock	0.85	3	2
Karas (Karoo)	Freehold livestock	0.17	2	0.8
Karas (Karoo)	Tourism	0.76	83	69
Hardap (Namib)	Tourism	5	601	516
Hardap (Kalahari)	Tourism	4	504	342

Region	Land use	Employees per 150 ha	GNI per ha (N$)	NNI per ha (N$)
Zambezi	Communal livestock	0.8	60	50
Zambezi	Communal cropping	75	626	443
Zambezi	Tourism	45	18,968	18,394

Why are land owners moving into wildlife and out of livestock?

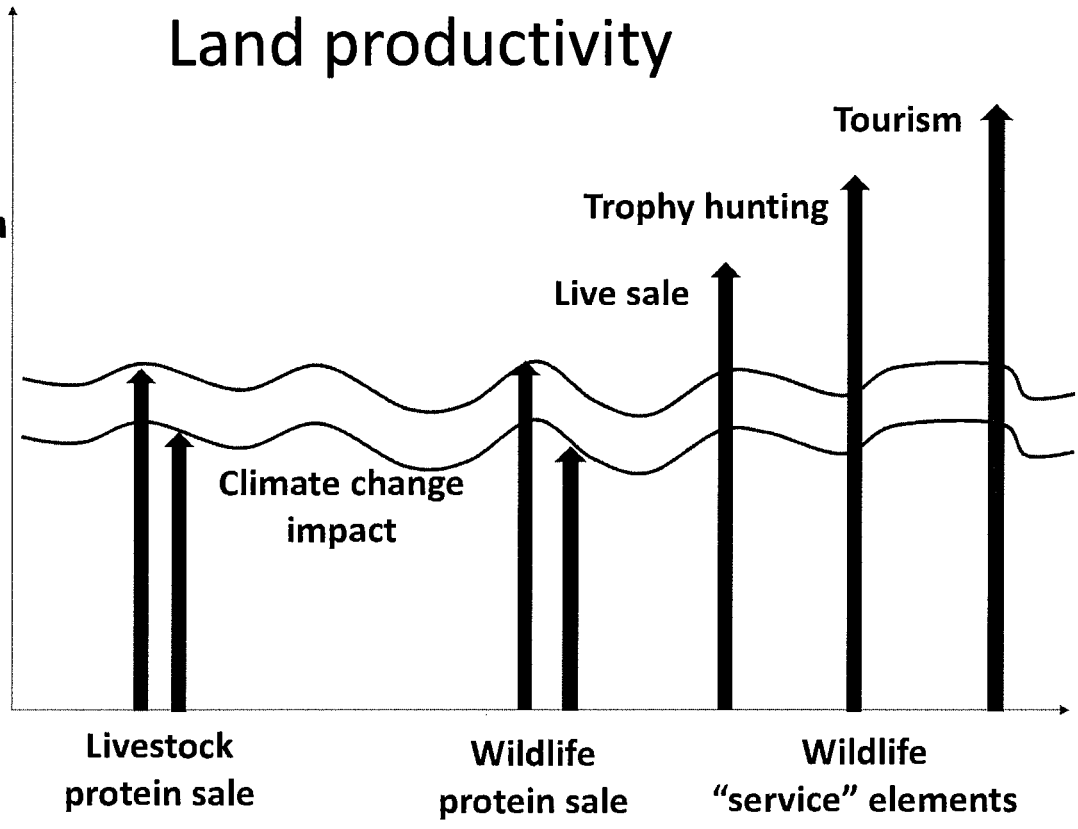


Economic returns to conventional farming (yellow line) and to wildlife management (green line) in areas of different land productivity, with rainfall being a good proxy for productivity

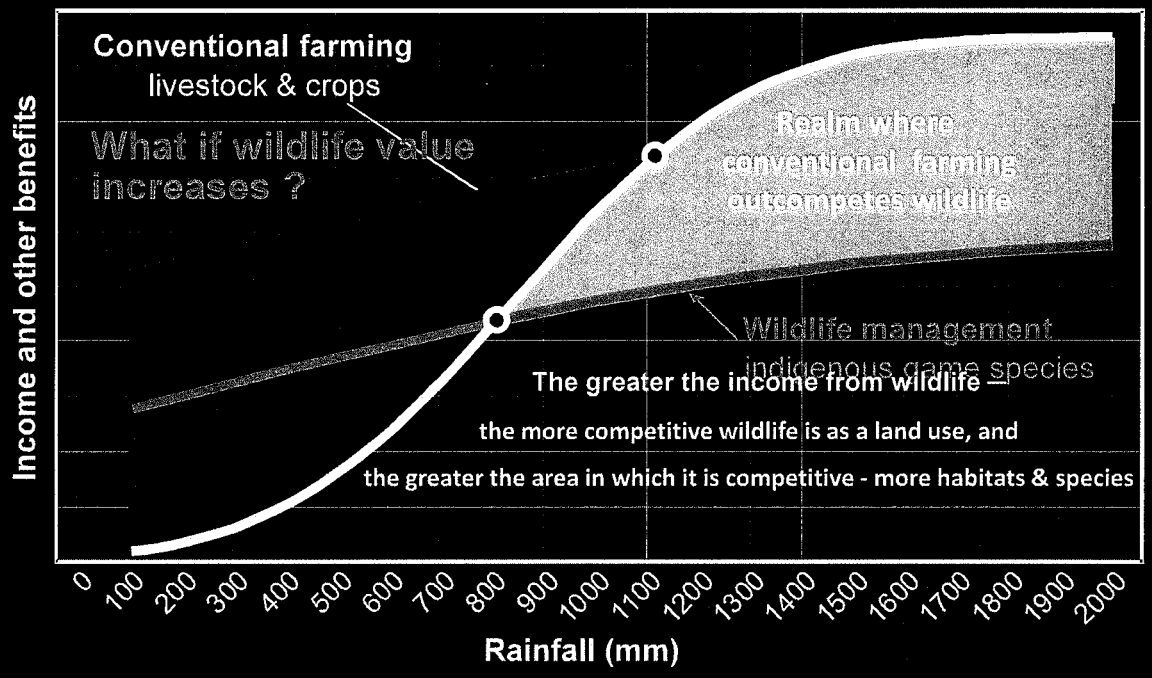
Service industries break through low primary production ceiling

Primary production ceiling

- Protein price
- Protein biomass
- Protein quality
- Area
- Soil
- Rainfall
- Management
- Agricultural policy
- Production costs



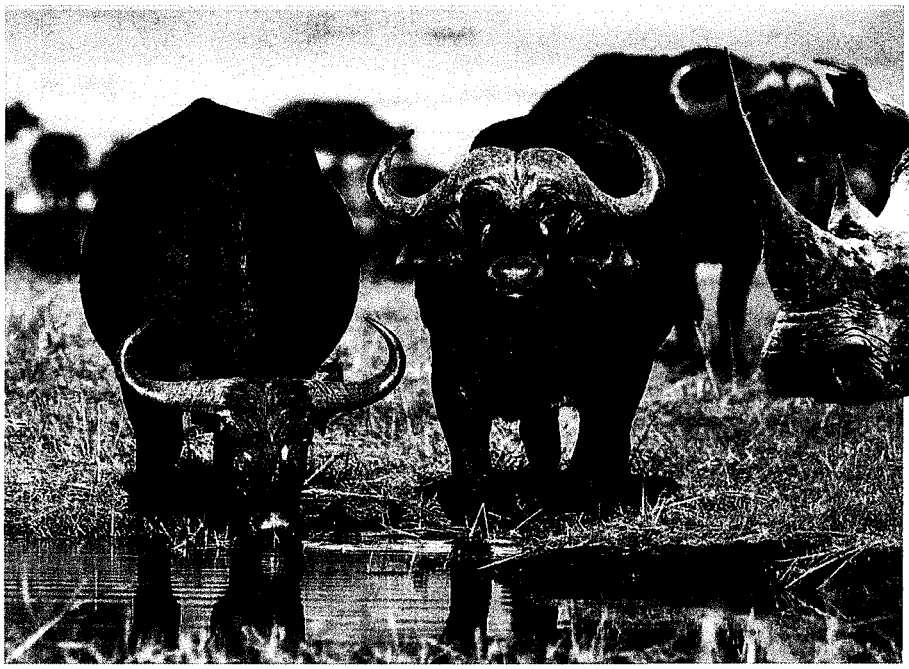
How could wildlife be even more attractive as a land use?

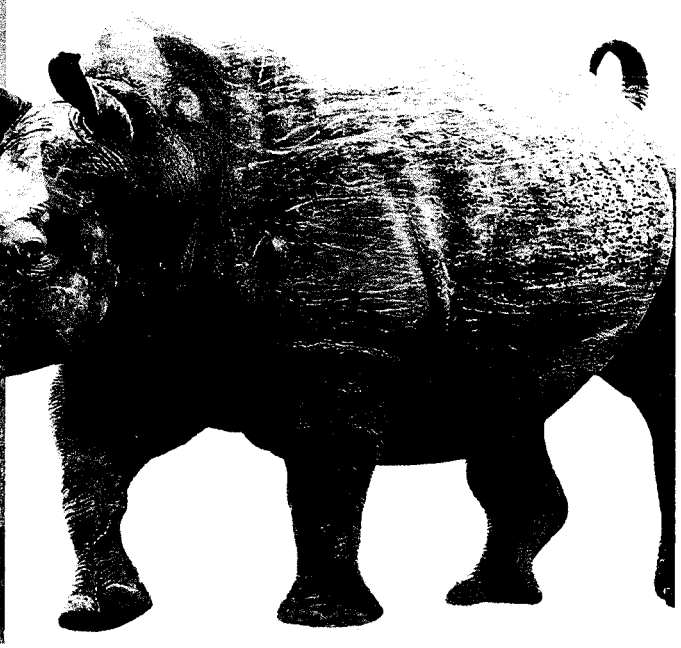


Improving economic returns to wildlife management over conventional farming in areas of different land productivity, with rainfall being a good proxy for productivity

How to increase value of wildlife?

1: Bring high value species into production



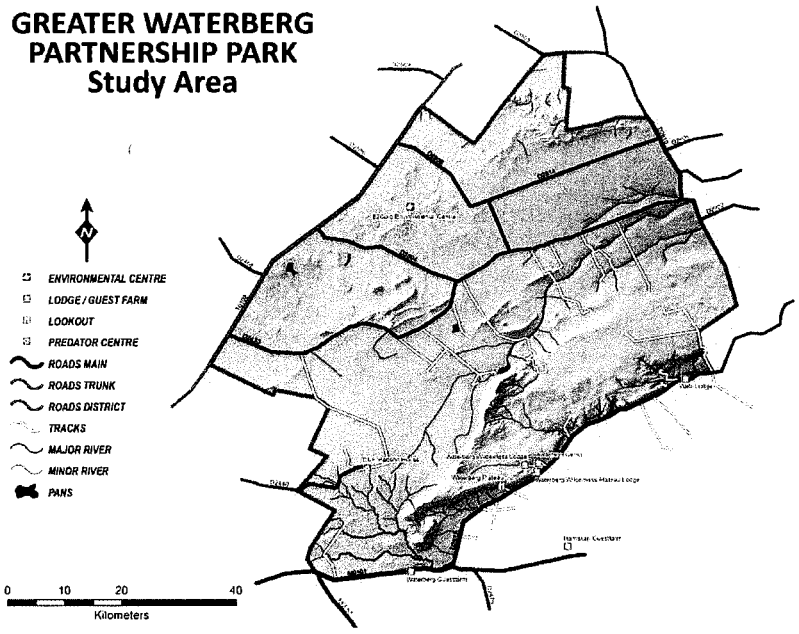


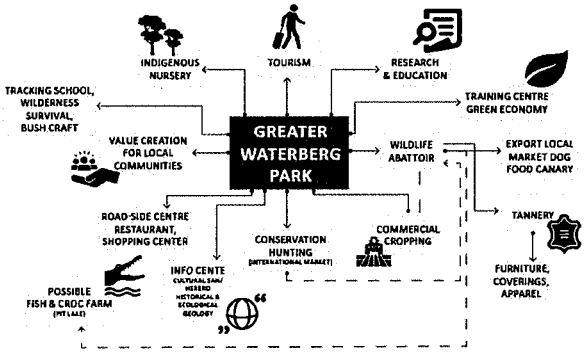
Why wildlife is a strategic response to climate change

- Wildlife is arid adapted
- Wildlife makes more $ / ha than conventional farming under our conditions
- Wildlife revenue per ha could be increased 4-5 times by adding in all wildlife species (especially buffalo and rhino)
- Wildlife has service elements (tourism & trophy hunting) that break through the low primary production / protein value ceiling
- Wildlife lends itself to working at scale – more efficient and productive
- Wildlife would be the largest renewable economy in Namibia
- Namibia could essentially climate-proof itself, and out-perform its land productivity levels prior to climate change
- Namibia could be an example to Africa, following this model to rewild the continent driven by market forces

How to increase value of wildlife?

2: Work at scale and diversity



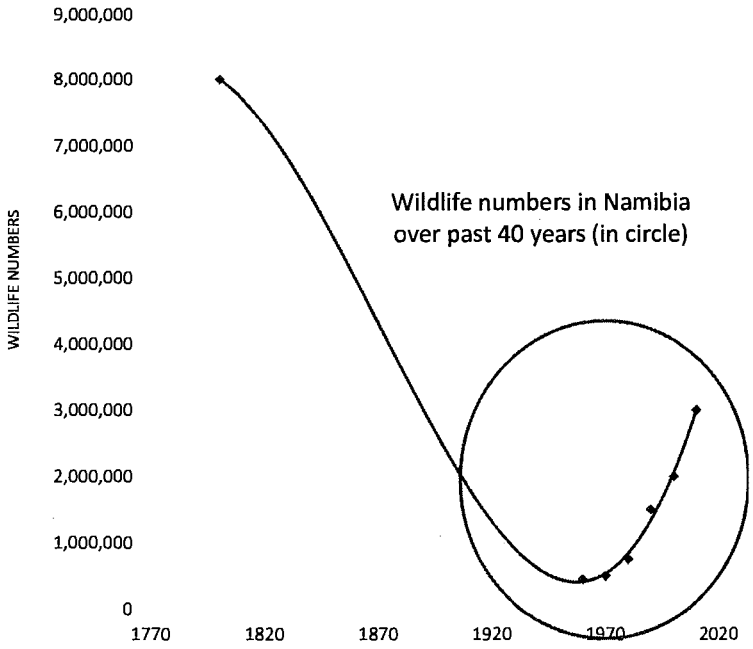


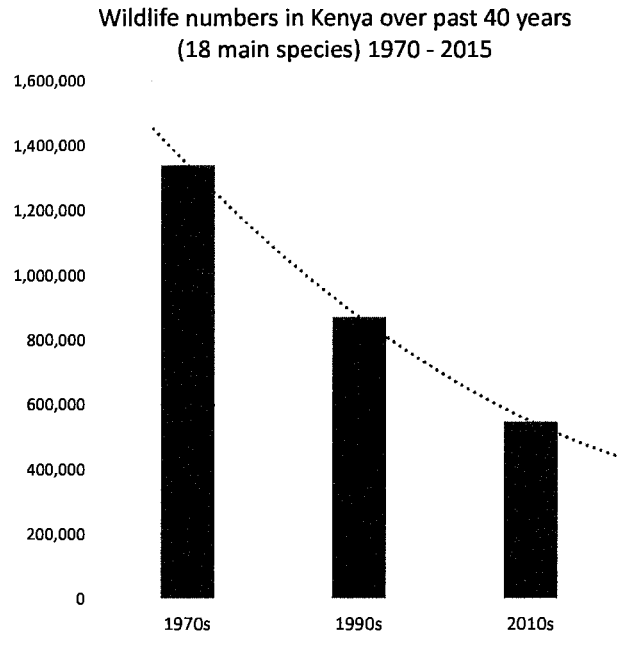
Why scale is important

- Large unfenced landscapes offer more economic opportunities
- Land value immediately increases when land is part of a larger vision and programme / story
- Tourism is enhanced – marketability, diversity, occupancy, pricing (and willingness to pay) because of a better product and experience
- Trophy hunting is enhanced because of the large open African landscape – no fences – better experiences and thus higher prices
- More diversity of wildlife – including predators and elephant, thus better marketability and revenue
- More diversity of enterprises – abattoir / meat processing facility, tannery, cannery, commercial outlets, etc.
- More institutional / organisational options, e.g. management agreements, shareholding (land Co, game Co, cattle Co, tourism Co) giving flexible options
- Financial diversification (land owners are also benefit financially from all enterprises), and more financing options

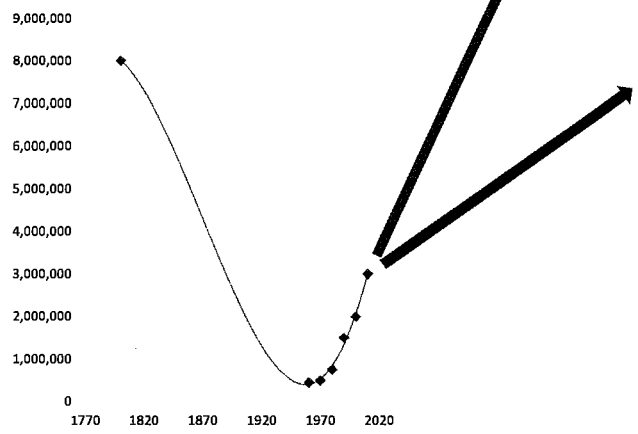
How to increase value of wildlife?

3: Protect our global competitive advantage





Where to from here?



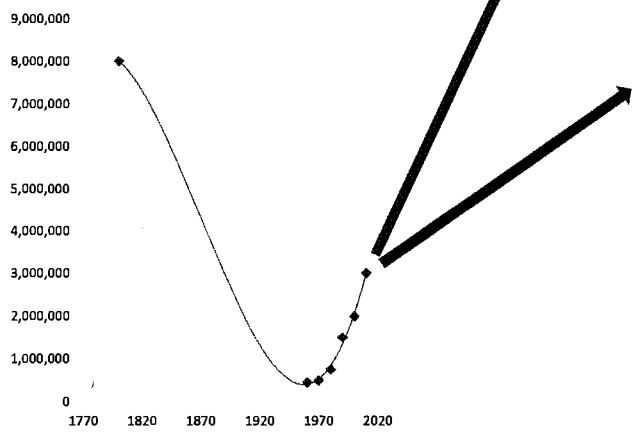
High road

- Open systems – landscape approach
- Indigenous species
- Natural ecological & evolutionary processes
- Good rangeland management and condition

Low road

- Intensification (small camps)
- Land fragmentation
- Selective breeding – colour morphs, hybrids
- Exotic species
- Cage breeding & hunting
- Land degradation

Where to from here?



High road

- National opportunities (all land owners & custodians)
- Long-term perspective
- Environmental integrity & resilience
- Drought-proofs and adapts to climate change
- Major conservation benefits - biodiversity, landscapes, connectivity
- Promotes Namibia's international conservation standing
- Enhances Namibia's economic competitiveness

Low road

- Get rich quick for a few
- Short-termism
- Environmental degradation
- No contribution to conservation values
- Compromises Namibia's conservation integrity
- Diminishes Namibia's economic competitiveness

Conclusions

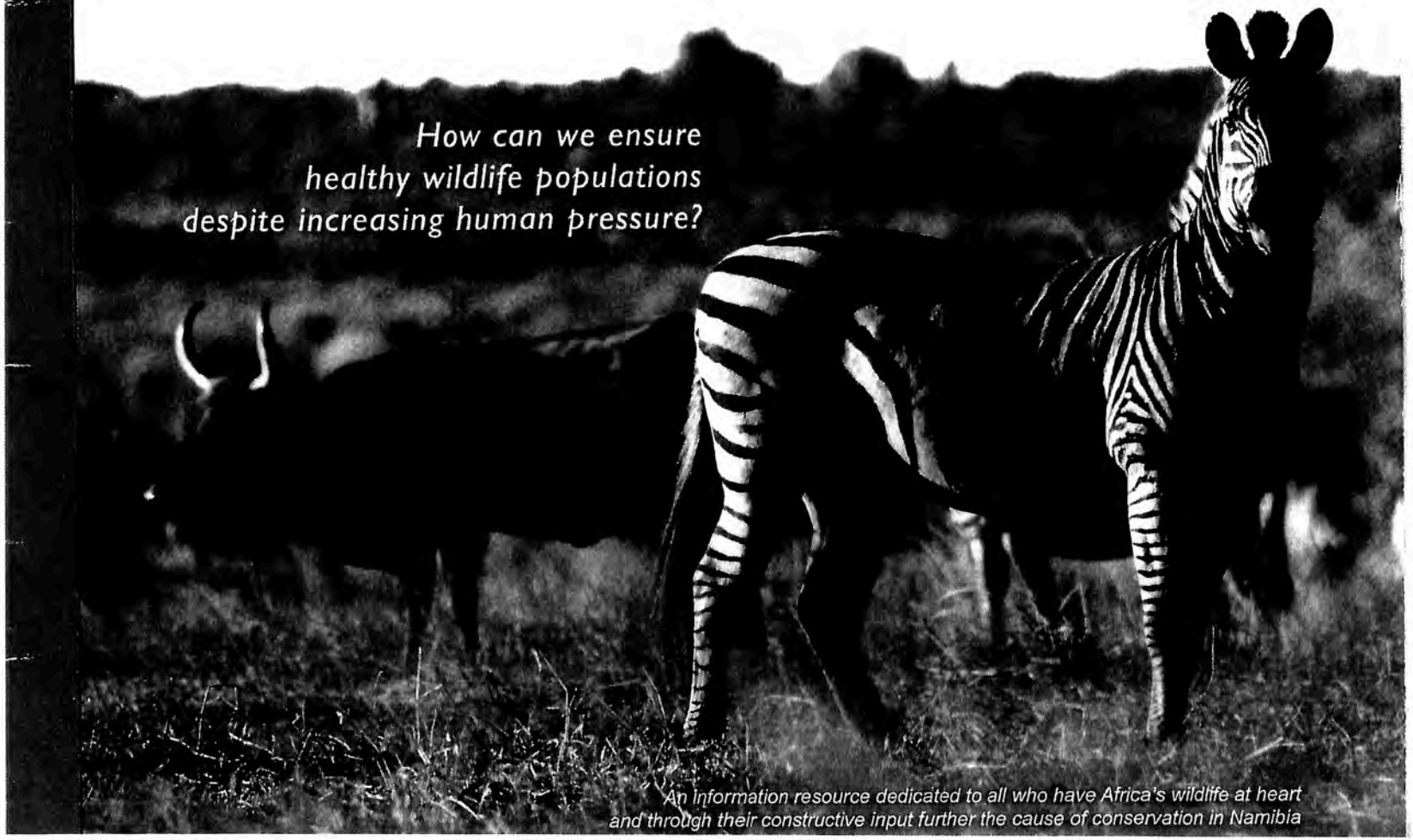
1. Build on Namibia's comparative and competitive wildlife advantages
2. Link wildlife as a land-use to economic development and to biodiversity conservation - they are all aligned (marketing value)
3. Align markets to work for sustainable use of wildlife, conservation of biodiversity and indigenous ecosystems through focused policies and legislation (including export of game meat and landscape approach)
4. Devolve rights and responsibilities over sustainable wildlife use still further to local level (reduce bureaucracy)
5. Use protected areas to create incentives for compatible adjacent landscapes and as "engines" for landscape development
6. Limit the role of government to that of creating a conducive environment, regulating for equity and providing extension and capacity-building services to those who need them

Thanks you

ceo@n-c-e.org

www.n-c-e.org

Keep Namibia's wildlife on the land!



How can we ensure healthy wildlife populations despite increasing human pressure?

An information resource dedicated to all who have Africa's wildlife at heart and through their constructive input further the cause of conservation in Namibia

What is really happening to our wildlife?

WILDLIFE IS RAPIDLY DECLINING ACROSS MUCH OF AFRICA AND OTHER PARTS OF THE WORLD

Over the last century, **lions** *were actively eradicated as a threat to human safety and to livestock from most land used by people; lions from the remaining populations continue to be killed over livestock losses and safety concerns in communal areas and along the periphery of parks today.*
Southern African **rhinos** *were driven to the brink of extinction a century ago, but populations were rebuilt through effective conservation activities; rhinos are now being decimated again by ruthless commercial poaching for their horns.*
A century ago, **Elephants** *were drastically reduced by the uncontrolled ivory trade, and displaced as a threat to crops and safety; today most of the remaining southern African populations are healthy and growing, but ruthless commercial poaching for ivory is again having an impact.*
Many other species *are experiencing similar declines, mostly due to land conversion to agriculture and incompatible land uses.*

- ***Widespread concern over wildlife declines is motivating ongoing global calls for action*** *– yet interventions do not differentiate between countries with an excellent conservation track record, and those with declining wildlife populations.*
- ***Attempts by foreign organisations to stop declines through field interventions often do not address the actual problems*** *– interventions often ignore the needs of local people and conservation priorities on the ground.*
- ***The public is unfortunately not informed accurately about the main causes for large-scale wildlife declines*** *– media reports, social media hype and calls for donations tend to focus on the gruesome death of individual animals as indicators of decline, rather than actual causes.*
- ***People are confusing the welfare of individual animals with the health of entire populations of the same species*** *– through passionate but misguided social media outcries, many people want to prevent all animal deaths in order to stop perceived cruelty to animals and wildlife declines.*

PREVENTING ALL WILDLIFE DEATHS FORCES PEOPLE TO REPLACE WILDLIFE HARVESTING WITH OTHER LAND USES

Namibia's **Elephant** *population has tripled since independence and elephants have re-colonised former ranges, largely facilitated by com conservation and benefits to local communities.*

Most other large wildlife species *in Namibia have healthier populations today than at any time over the last 150 years.*

- *Differentiating between countries with successful conservation approaches and those without is essential – conservation is a sc based management activity and successful approaches should not be undermined by generalised emotional responses and inappropriate a*
- *Conservation by the people for the people is extremely successful in Namibia – by conferring rights to own and manage wildlife t communities, the Namibian government has empowered land holders to conserve wildlife in a healthy balance with other land uses.*
- *Namibians embrace wildlife management as a land use, thereby safeguarding wildlife habitat throughout the country – Namit documented significant wildlife recoveries in parks and on communal and freehold land throughout the country for several decades.*
- *By harvesting small percentages of various populations, Namibia is keeping overall wildlife stocks healthy, just as farmers anywher world keep their overall livestock herds, gardens and fields healthy while harvesting an annual crop to generate income and enable develo*

PROMOTING WILDLIFE USE CREATES INCENTIVES TO KEEP WILDLIFE ON THE LAND AS AN ECONOMIC ASSET

The main causes of large scale wildlife declines:

HABITAT LOSS THROUGH HUMAN LAND USES THAT ARE INCOMPATIBLE WITH WILDLIFE is the largest single cause of wildlife declines around the world.

Displacement of wildlife by agriculture – *wildlife is not tolerated in crop fields and competes with or threatens livestock.*

Degradation of habitat by unsuitable land uses – *overgrazing, indiscriminate burning, logging, mining etc. may all severely degrade habitats.*

Destruction of habitat through infrastructure development – *urban spread, roads, power lines, dams etc. may all destroy habitats.*

Disturbance by human activity – *excessive presence and movement of people, stray dogs, traffic, noise etc. may all displace wildlife.*

UNCONTROLLED EXPLOITATION AND COMMERCIAL POACHING are causing rapid declines amongst already isolated wildlife populations in many African countries.

Poaching of animals for trade in animal parts – *trade in ivory, rhino horn, skins, bones etc. is fuelling ruthless commercial poaching.*

Ruthless exploitation for personal gain – *uncontrolled over-harvesting veiled as 'legal use' is rampant in countries with poor governance.*

Proven ways to stop wildlife declines and rebuild populations:

HABITAT PROTECTION AND EXPANSION THROUGH COMMUNITY CONSERVATION BASED ON WILDLIFE USE **enables large-scale wildlife recoveries, mitigates human impacts and facilitates the health of ecosystems.**

Tourism *motivates conservation in scenic areas, especially along major tourism routes, by generating most jobs and some conservation funds.*

Conservation hunting *motivates conservation in vast areas of low tourism potential by generating most conservation funds and providing food.*

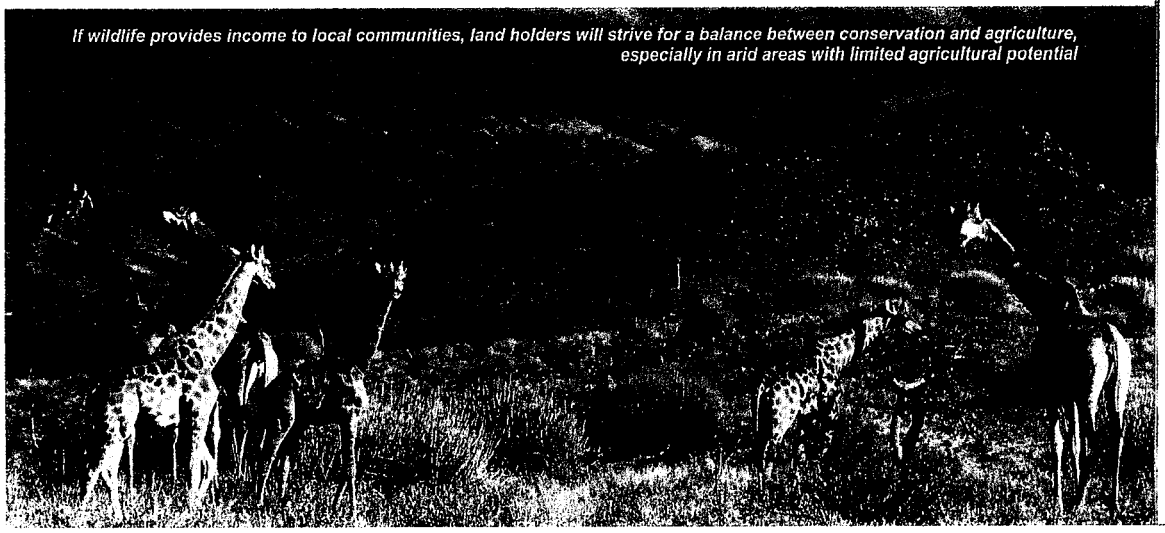
Meat harvesting *motivates increasing wildlife populations by providing food and generating additional income.*

Live capture and sale *enables restocking in areas with low populations and provides further income from wildlife.*

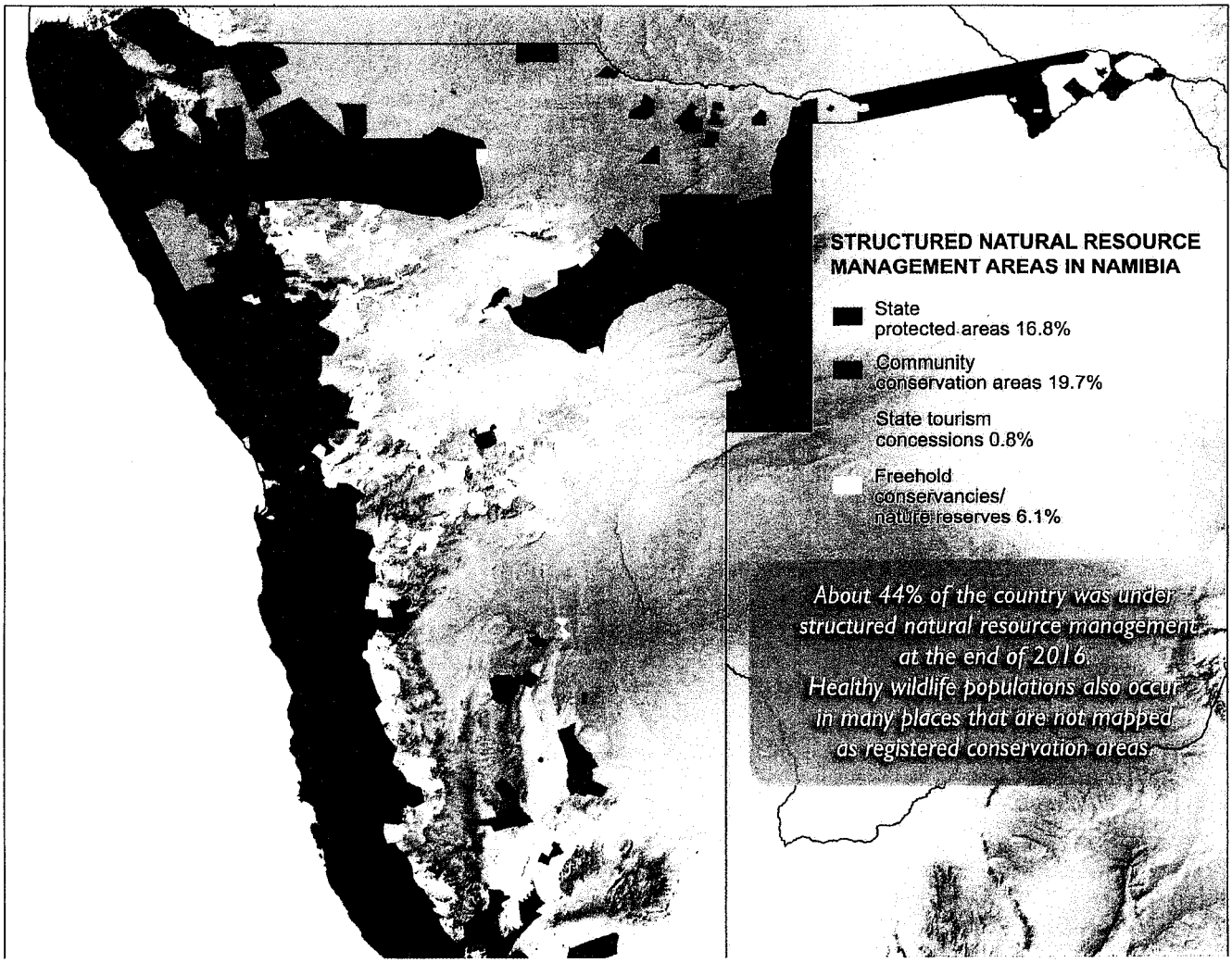
All of these uses can and should be combined where possible to maximise returns and provide a variety of benefits to different people in each community.

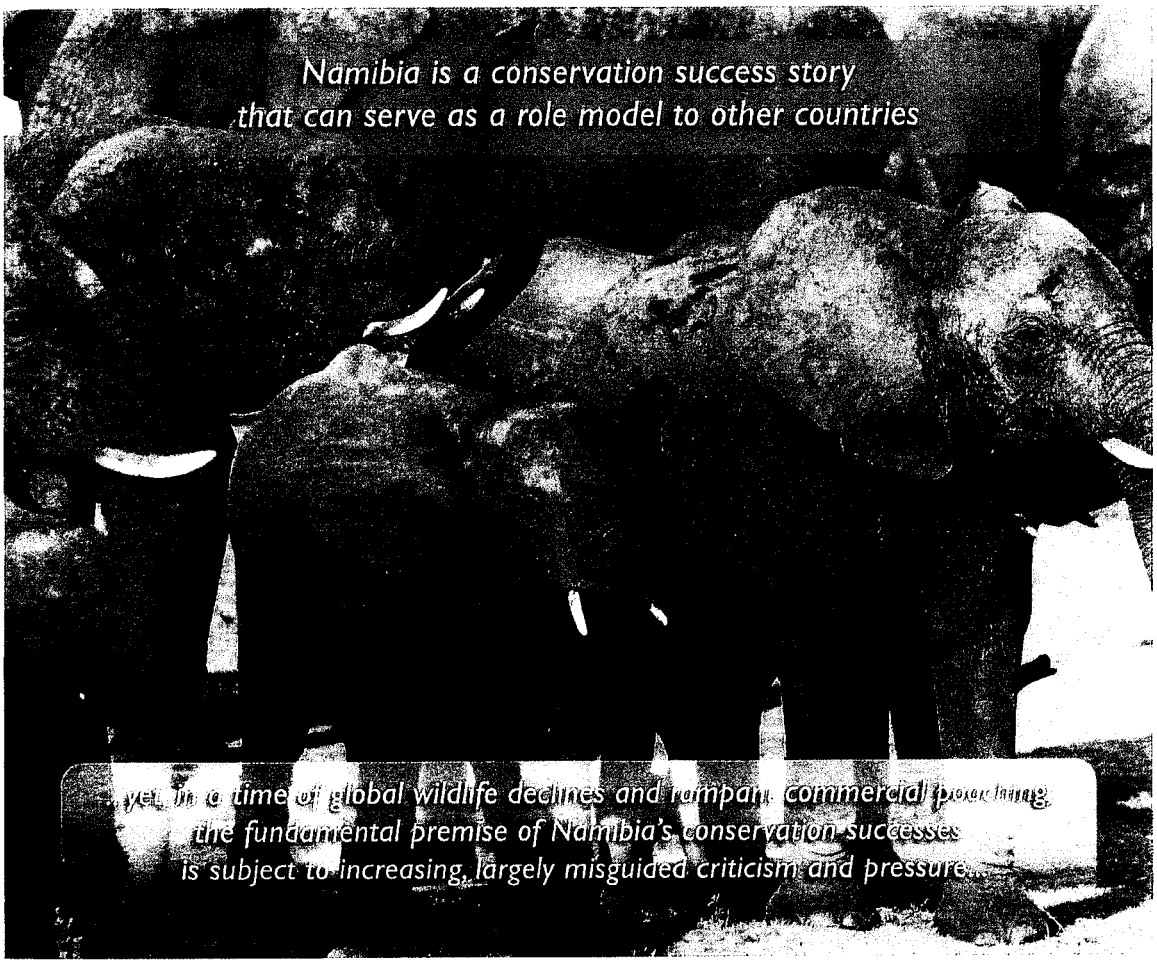
ACTIVE AND COLLABORATIVE WILDLIFE CRIME PREVENTION **limits impacts from commercial poaching by teaming up relevant stakeholders including local communities, tourism and hunting operators, NGOs and government agencies.**

STRINGENT CONTROL MECHANISM FOR ALL WILDLIFE USE **prevent uncontrolled exploitation and over-harvesting.**



If wildlife provides income to local communities, land holders will strive for a balance between conservation and agriculture, especially in arid areas with limited agricultural potential


STRUCTURED NATURAL RESOURCE MANAGEMENT AREAS IN NAMIBIA
State protected areas 16.8%
Community conservation areas 19.7%
State tourism concessions 0.8%
Freehold conservancies/ nature reserves 6.1%
About 44% of the country was under structured natural resource management at the end of 2016.
Healthy wildlife populations also occur in many places that are not mapped as registered conservation areas.


Namibia is a conservation success story
that can serve as a role model to other countries
yet, in a time of global wildlife declines and rampant commercial poaching,
the fundamental premise of Namibia's conservation successes
is subject to increasing, largely misguided criticism and pressure...

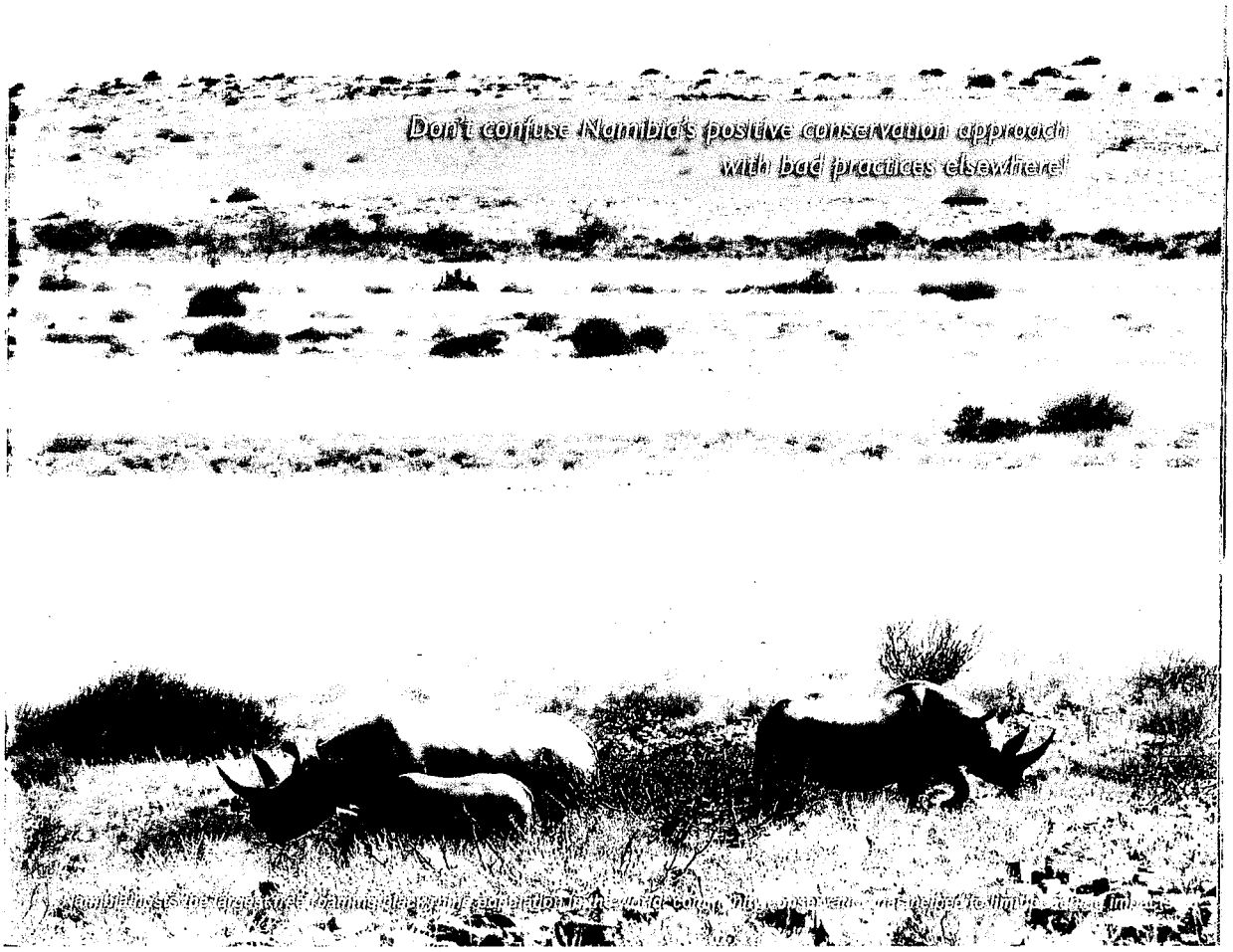
Namibia is a conservation success story:

Background information:

1. Namibia's economy is largely reliant on natural resources; about two-thirds of the human population live in rural areas and are directly dependent upon natural resources for their livelihoods.
2. Wildlife populations have shown dramatic recoveries on both freehold and communal farmland after drastic declines prior to independence due to drought, poaching and detrimental policies.
3. Healthy populations of nearly all historically-occurring species now roam suitable habitat; species of particular conservation concern are receiving special attention.
4. Agricultural policies and approaches, rather than conservation practices, have limited the population health of some species such as buffalo and wild dog.
5. Wildlife is managed and protected in national parks, in community conservation areas and on freehold land across more than half of Namibia.
6. The success is based on giving wildlife a real value for the local people who manage and protect it – and bear the cost of living with it.
7. Community conservation generated over N$ 111 million in returns for rural communities and facilitated around 5,147 jobs during 2016.
8. Community conservation contributed about N$ 692 million in net national income to Namibia's economy in 2016.
9. The sustainable use of wildlife and other natural resources is enshrined in Namibia's constitution; natural resources are a part

Conservation highlights:

1. Namibia has healthy populations of black and white rhinos, including the largest free-roaming black rhino population outside parks in the world.
2. Namibia's elephant population has grown from an estimated 7,500 animals in 1995 to around 22,000 today – a large percentage occurs outside parks.
3. Namibia has healthy lion populations in several national parks, and an expanding lion population outside parks, which has grown in north-western Namibia from an estimated 25 animals in 1995 to around 150 today.
4. Namibia has the largest population of free-roaming cheetahs in the world – the vast majority of which live outside parks.
5. Namibia has healthy giraffe populations in several national parks and an expanding giraffe population outside parks.
6. Namibia has healthy leopard populations in several national parks and leopards occur across much of Namibia's freehold and communal farmland.
7. Namibia has a healthy crocodile population with a large percentage occurring outside parks.
8. Namibia has translocated more than 10,000 animals of 15 different game species – including rare and valuable species such as black rhino, sable and giraffe – out of parks into communal and freehold areas to boost populations there.
9. Namibia has reinstated several species that had become locally extinct in communal and freehold areas.


Don't confuse Namibia's positive conservation approach
with bad practices elsewhere!

Namibia's CBNRM solutions for wildlife inside and outside parks

Namibia balances conservation priorities and the needs of rural communities:

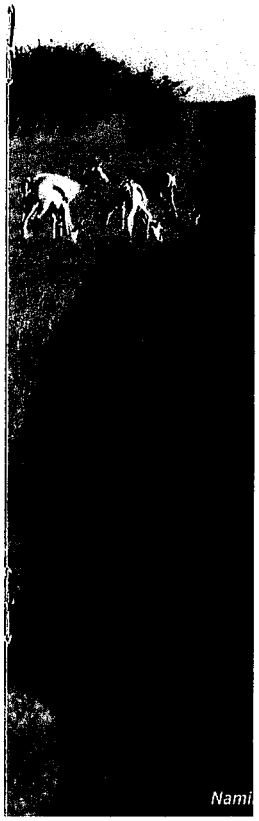
In Namibia, most communal land (around 40% of the country) and privately-owned or freehold land (around 43% of the country) is used to generate a living for the land holders. Livestock herding, crop production and game management are the main land uses.

Conservation outside national parks therefore depends on giving wildlife a tangible value so that people keep it on the land – rather than eradicating it in favour of livestock, crops or other land uses.

Keeping wildlife on the land also means living with wildlife – wildlife that can be dangerous and destructive.
Disney is not reality – in real life...

- ***... lions**, crocodiles and other predators eat livestock and sometimes kill people*
- ***... elephants** raid crops and destroy water installations and also sometimes kill people*
- *... many other wild animals such as hippos, buffaloes and rhinos can also be difficult and dangerous to live with.*

- *Wildlife use is a traditional and integral part of life in rural Africa – hunting is a part of African culture. This was the same in Europe and America – when people still lived from the land and the wildlife was still there.*
- *Namibia protects around 17% of its land in national parks – that's more than most countries.*
- *Community conservation areas cover about 20% of Namibia and embrace around 195,000 people.*
- *Tourism concessions in parks provide important income for neighbouring communities, promoting conservation.*
- *Wildlife conservation outside parks must be seen as wildlife management for the benefit of the people – not wildlife preservation for the benefit of an urban ideal.*
- *Rural people need the land to survive – for livestock herding, for crop production and for wildlife management.*
- *Wildlife management outside parks is an economic activity – just like farming – otherwise wildlife will be pushed out by land uses that generate better returns from the same land at lower costs.*
- *Photographic tourism is an ideal use of intact ecosystems with healthy wildlife populations, but can only be practiced in accessible areas with enough scenic interest and/or high wildlife densities – this leaves large areas without tourism value or income.*
- *Conservation hunting funds community conservation structures – including 83 communal conservancies and around 584 community game guards and resource monitors.*
- *Conservation hunting funds anti-poaching activities by government agencies, community conservation organisations and private sector initiatives.*



Namibia balances wildlife management outside parks with other land uses such as livestock herding and crop production

Namibia's conservation success is based on science and proof!

Namibia has one of the most intensive wildlife monitoring and utilisation control systems in Africa and the world:

Namibia uses a variety of systems to monitor and manage wildlife populations. The systems differ between national parks, community conservation areas and private farmland and are tailored to meet local needs. Management is by no means perfect in all areas or at all times. Yet the general approach of actively using wildlife outside parks for the benefit of rural communities has proven to be very successful, enabling healthy wildlife populations and strengthening local livelihoods. Namibia's dynamic conservation community ensures that environmental concerns are publicly recognised. While a balance between economic development and conservation in rural Africa is often problematic, most stakeholders strive to address issues. Collaboration between government, local communities, support NGOs and the private sector is a key to Namibia's conservation success.

- *No single approach or system is perfect. The flexibility to adapt to changing needs and circumstances is more important than any one system or approach.*
- *Namibia has excellent knowledge of its wildlife populations through ongoing research and regular, rigorous monitoring activities and systems, including aerial surveys, road counts, foot patrols and remote wildlife tracking using cutting-edge technology.*
- *The Ministry of Environment and Tourism has clear compliance requirements for wildlife management*
- *Stringent monitoring and control systems for all wildlife harvesting facilitate effective management and minimise misuse.*
- *Offtakes are carried out according to annual quotas based on sustainable harvest rates and are controlled through permits and reporting requirements.*
- *The effects of offtakes over time are monitored and harvest rates are adapted to keep populations healthy if population changes occur.*
- *Regular quota revisions for wildlife harvesting are based on monitoring data and scientific guidelines.*
- *Land use objectives differ between national parks, community conservation areas and private farmland, resulting in varying wildlife densities in different areas.*
- *Challenges are a part of wildlife management, especially when attempting to balance the needs of large, dangerous wildlife with the needs of poor rural communities.*
- *Increasing human-wildlife conflict is a result of increasing game numbers and a sign of successful conservation; it is also one of the biggest challenges for wildlife management outside parks.*
- *Wildlife in open, unfenced systems is free to roam and is susceptible to drought and disease, resulting in natural population fluctuations.*
- *Continually adapting activities to changing circumstances facilitates sustainability.*

Namibia uses scientific principles and cutting-edge technology to monitor and manage wildlife populations

Sustainable wildlife harvesting promotes conservation!

What exactly is sustainable wildlife harvesting?

Sustainable wildlife harvesting means harvesting a limited percentage of wildlife stocks without compromising the health of the overall population, in order to generate income for local communities and enable wildlife management as a viable land use. When this is legally-entrenched, well-controlled and based on scientific principles and sound knowledge, it is fully sustainable.

Wildlife harvesting has been a natural factor controlling game populations throughout human evolution, just like the impact of lions and other predators.

Sustainable wildlife harvesting...

- *Is carried out by local land holders.*
- *Creates incentives to keep wildlife on the land.*
- *Keeps natural habitats intact.*
- *Provides alternative income and strengthens rural livelihoods, especially in remote, arid environments.*
- *Enables a mix of land uses including livestock and cropping.*
- *Strengthens resilience against impacts from climate change.*
- *Strengthens resilience against external economic or political influences and reduces dependency on agriculture.*
- *Pays for conservation structures and anti-poaching activities.*
- *Provides meat for rural communities.*
- *Ensures stakeholders have a real interest in conserving wildlife.*
- *Reinforces traditional cultural values related to wildlife.*
- *Safeguards indigenous knowledge about wildlife.*

Sustainable wildlife harvesting includes these activities:

- *Conservation hunting (hunting with clear conservation outcomes targeting a very small percentage of the total population).*
- *Meat harvesting (using minimum-impact methods and offtake rates well below natural population growth rates).*
- *Live capture and sale (moving surplus animals from high density areas to low density areas within their natural range).*

What exactly is conservation hunting?

Conservation hunting consists of harvesting small numbers of indigenous wildlife as part of a personal wilderness experience based on traditional human survival skills. Conservation fishing harvests indigenous fish according to the same principles. These activities have verifiable prerequisites and outcomes (see opposite page) while focussing on wilderness experiences and participation in natural dynamics through regenerative pursuits. They can be combined under the term wildernessing and promote the protection of free-roaming indigenous species in their natural habitat.

The Namibian conservation hunting fraternity adheres to guidelines for ethical hunting, including:

- *Stalking game in natural habitat to ensure a wilderness experience and fair chase.*
- *Ensuring minimum suffering for hunted animals.*
- *Targeting mature animals that can be harvested without negative impacts on the overall population.*
- *Ensuring that all meat and other products of all hunted animals are used.*
- *Hunting predators in an ethical manner only as part of predator management.*

Clear distinction between conservation hunting and other sustainable wildlife harvesting with low or high intensity shooting practices

CONSERVATION HUNTING HAS THE FOLLOWING VERIFIABLE PREREQUISITES AND OUTCOMES:

1. It is governed by a national legal framework with clear systems of controls and reporting requirements.
2. It meets all CITES and IUCN species conservation criteria.
3. It targets only free-roaming, indigenous species in natural habitats large enough to ensure healthy population dynamics.
4. Wildlife population trends in the greater landscape are closely monitored and offtakes are adapted as needed to ensure the population health of all targeted species.
5. Offtakes are sustainable, based on species-specific, scientifically-accepted annual quotas for the hunted population.
6. It promotes the natural diversity of all indigenous fauna and flora in the hunting area.
7. It safeguards wildlife habitat (the hunting area) against destructive land uses.
8. A major portion of generated income goes back to the land holders and is spent on the conservation and human development needs of the hunting area.
9. It employs local people to carry out conservation activities in the hunting area, including wildlife monitoring and anti-poaching activities.
10. It mitigates human-wildlife conflict amongst local communities if these occur in, or adjacent to, the hunting area.

Through these criteria, conservation hunting creates clear incentives to adopt wildlife management as a land use.

Conservation hunting promotes the protection of free-roaming, indigenous wildlife and its natural habitat

Habitat loss and crime are the biggest killers of wildlife!

WILDLIFE PRESERVATION WITHOUT HABITAT CONSERVATION IS MEANINGLESS!

Land conversion and resultant habitat loss is mostly overlooked by the public, but is the biggest killer of wildlife!

Wildlife needs large areas of intact habitat to ensure healthy populations:

- *Most game needs undisturbed access to water, which it does not have if pressure by people, their livestock or their dogs is too high.*
- *Many species need to be able to roam widely in search of food, especially in areas with highly variable rainfall; fences, roads, settlements and other infrastructure all fragment habitat and inhibit the ability of wildlife to respond to seasonal food availability.*
- *Wild animals need shelter to which they can retreat when chased by natural predators or disturbed by people.*
- *Game needs large enough areas to engage in natural interactions, especially breeding and rearing of young.*
- *Wildlife can coexist with livestock, but is often eradicated by farmers who see it as grazing competition or a threat to infrastructure or safety.*
- *Wildlife is not tolerated in crop fields or gardens; effective zoning of crops into land use mosaics can leave adjacent wildlife habitats intact.*

PEOPLE ONLY MAKE THE EFFORT TO KEEP WILDLIFE HABITATS INTACT IF THEY HAVE A TANGIBLE INCENTIVE TO DO THIS.

POACHING AND UNCONTROLLED EXPLOITATION DECIMATE WILDLIFE!

Poaching and uncontrolled exploitation should never be confused with legal, sustainable wildlife harvesting!

Poaching...

- *Is stealing from the rightful owners – the local communities.*
- *Steals valuable wildlife products for sale in other areas or other countries.*
- *Takes the wildlife value out of the country and provides no local income or benefits.*
- *Undermines conservation activities and harms the resource base.*
- *Undermines tourism and other legal wildlife uses.*
- *Has a severe impact on high value species.*

Uncontrolled exploitation...

- *Places immediate financial gain over sustainability*
- *Abuses legal loopholes to exploit resources.*
- *Takes advantage of weak control mechanisms.*
- *Relies on weak governance and corruption.*
- *Benefits only a small number of individuals.*
- *Undermines conservation activities and harms the resource base.*
- *Undermines tourism and other legal wildlife uses.*
- *Is not sustainable.*

COMMERCIAL POACHING, ESPECIALLY OF RHINOS AND ELEPHANTS, IS A HUGE THREAT TO NAMIBIA'S VALUABLE WILDLIFE AND TO A VARIETY OF INDUSTRIES BASED ON IT.

TROPHY BREEDING AND SHOOTING DISCREDITS ALL SUSTAINABLE WILDLIFE HARVESTING!

Trophy shooting activities motivated only by financial gain should not be confused with conservation hunting!

These and similar practices make no conservation contributions and are not part of conservation hunting:

- *Canned shooting (shooting animals in small enclosures).*
- *Put-and-take shooting (releasing captured trophy animals for the sole purpose of shooting them).*
- *Breeding lions and other predators for trophy shooting.*
- *Breeding rarities such as black springbok, golden oryx etc. for the trophy trade.*
- *Introducing exotic species such as blesbok, nyala etc. for trophy shooting.*
- *Unethical shooting of animals based only on their trophies (rather than fair chase hunting based on a wilderness experience).*
- *Genetic manipulation of the gene pools of species to enhance trophy quality.*

GAME USE MUST BE ABLE TO PROVE CONSERVATION OUTCOMES TO BE ACCEPTED AS A VIABLE CONSERVATION ACTIVITY

EMOTIONAL ANTI-HUNTING CAMPAIGNS UNDERMINE CONSERVATION!

Anti-hunting campaigns based on emotional opinions should not derail proven conservation approaches!

In a modern world of inter-connectivity, social media and concerned global citizens, well-meaning but at times misguided international opinion and pressure don't always bring positive change – they also have the ability to influence and change legitimate local activities for the worse. Local communities and environments are often the worst-affected.

- *Calls for a hunting ban in Namibia are based on urban values and opinions, not on rural conditions and needs, and are often orchestrated by animal welfare organisations and misguided followers.*
- *A small, economically secure urban elite is challenging legal and highly beneficial activities in Africa from an idealistic moral standpoint.*
- *A hunting ban dispossesses and disempowers local decision-making and enforces a foreign moral view upon Africans.*
- *A hunting ban would have the most negative impacts on the elements that the international public is attempting to support – wildlife populations and local people outside national parks.*
- *In-depth understanding of wildlife dynamics, based on scientific principles, should not be dismissed by emotional, misguided external public opinions.*

NAMIBIA'S WELL-DOCUMENTED, SUCCESSFUL APPROACH TO CONSERVATION SHOULD NOT BE JEOPARDISED BY OUTSIDERS

What would be lost, if wildlife could not be used to generate income for local communities outside parks?

Hunting bans, which could consist either of Namibia stopping the activity of hunting, or of other countries stopping the import of hunting authentica – thereby closing the market – would have detrimental effects for wildlife outside parks, and for people currently benefitting from that wildlife.

- *The loss of income to the national economy is currently not quantified, but is likely to be over a billion Namibia Dollars.*
- *A hunting ban would result in at least N$ 43 million of lost annual returns for conservancies if all wildlife harvesting were banned, and would have a direct impact on at least 55 of the 62 conservancies currently generating returns from natural resources.*
- *Loss of conservation hunting income would result in at least 32 conservancies becoming financially unsustainable.*
- *If no immediate alternative income streams could be secured, a large percentage of the currently 584 community game guards and resource monitors employed in conservancies across Namibia would stand to lose their jobs.*
- *The loss of natural resource management structures would have immediate negative effects on wildlife populations and the health of other natural resource stocks.*
- *The loss of community game guards would significantly reduce Namibia's ability to combat poaching, especially of free-roaming rhino and elephant.*
- *Discontinuing regular wildlife monitoring and annual game counts would seriously undermine effective wildlife management.*
- *The loss of natural resource returns for local communities would result in an immediate reduction in people's tolerance of problematic wildlife such as elephants, lions and other predators.*
- *Reduced tolerance of wildlife would lead to an increase in retaliatory killing of problematic animals.*
- *A reduced sense of ownership over wildlife would lead to increased bush-meat poaching as well as poaching of high-value species.*
- *Across much of the currently 165,182 square kilometres of community conservation area, wildlife would no longer be considered a land-use priority and would be displaced by other uses such as livestock.*
- *On a large percentage of freehold farms with limited or no tourism potential, wildlife would also be displaced.*

MOST LARGER WILDLIFE SPECIES WOULD BE DISPLACED FROM MUCH OF NAMIBIA IF THEY COULD NOT BE USED TO GENERATE INCOME

Using wildlife ensures its value for land holders and KEEPS IT ON THE LAND!

The economic value of wildlife creates the incentive for land holders to include wildlife as a land use. If wildlife is not used, but preserved only for its own sake, it has little place outside parks, because land outside parks is used to generate rural livelihoods and contribute to the national economy.

- *Eat game meat to keep wildlife on the land – eat beef, and put more cattle on the land.*
- *Harvesting sustainable numbers of wildlife keeps overall populations healthy and avoids over-stocking.*
- *Conservation hunting promotes wildlife conservation and habitat protection.*

Don't confuse wildlife loss
with wildlife use!
Animals are merely poor animals unless people value their existence without generating benefits, they will be eradicated.

Further information resources:

Community conservation in Namibia:
(especially the annual Community Conservation Report)
State protected areas in Namibia:
International wildlife trade regulations:
International biodiversity conservation -

Ministry of Environment & Tourism

NACSO
Namibian Association of CBNRM Support Organisations

The Namibian Association of CBNRM Support Organisations (NACSO) embraces a variety of NGOs and individual members, who provide a range of technical and funding support to community conservation. Three NACSO working groups, namely the **Natural Resources Working Group** (NRWG), the **Business, Enterprises and Livelihoods Working Group** (BELWG) and the **Institutional Development Working Group** (IDWG), facilitate coordinated service provision to rural communities. More information:

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.:	174836
VALID FROM:	24.10.17
VALID TO:	24.10.17

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 B. Swan

Residential Address: .....

Country: USA

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
	Buffalo	
CITES I	Crocodile	/
	Dik-dik	
	Eland	1X
CITES II	Elephant Already in Gabler	1X
	Giraffe	1X
	Grey Duiker	2X
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
CITES II	Lechwe	
	Oryx (Gemsbok)	1X
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	2x
	Warthog	1X
	Waterbuck	—
	Wildebeest, blue	1X
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other T.I.W	2x

on the following farms / hunting concessions: NTA Tyra Conservancy

Guided by (name of guides): A.H Indaba (on) A.M. Alberts, P Trauernicht & D Gabler

Cashier receipt No.: 2666382

Issued on .....

Amount received: N$ .....

Alberts, A.M. Alberts

Authorizing officer

Official MET date stamp

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

cate must be completed immediately after each animal that has been hunted (please print)

es	LH*	RH*	LB*	RB*	Total	RW*	Age	Male Female	Farm Name	Farm No	Farm owner	Hunter	P M H
ant	#62kg	#24,5kg					5	Male	NHA jagtområde	Conservancy		(b) (6)	
	LT 137cm												
	RT 153cm												

ɔrn, B=Base, RW=Rowland Ward

nt unless accompanied by a professional hunter,, master hunting guide or hunting guide.

on the person of the permit-holder at all times while hunting.

d on the permit ma conduct the hunt.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a Permit to Import a threatened-listed Elephant Trophy from Namibia

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 this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservationforce.org

(b) (6)

SIGNATURE

David Bruce Sanson

PRINT FULL NAME

7/22/2020

DATE

1. Name of area operator: Peter Thormahlen

   a. Years in business: 20

   b. Name of company conducting hunt: Thormahlen & Cochran Safaris

   2. Name of concession: **N#a Jagna Conservancy** Size in km^2: 9,120 or 900,120 ha

   a. Land tenure: __ Government lease _X_ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: 2016-2024 Can it be renewed? _X_ Yes __ No

   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:

CONTRACTUAL OBLIGATIONS

- ANNUAL REPORTING -The Trophy Hunting Operator must submit an Annual Report Yearly within 30 days after the hunting season ends, which is 30 November. These Annual Reports are handed in at the Ministry of Environment & Tourism, as well as a copy at the Conservancy office, and the WWF office. Failure to submit the report timeously is punishable with a fine of N$5,000.

- MEAT DISTRIBUTION – All hunted Trophy, as well as Non-Trophy game meat is distributed to villages in the concession within 24 hours after being hunted. As a company Policy we do not leave any remains of elephant where it was hunted - no bones, skin, meat etc. After 2 days diesel is poured onto the stomach content and blood at the slaughtering site, wood stacked on top and burned. This is done to cause as little as possible stress on the elephants as there is no smell left of the hunted elephant or its remains. Elephant gets stressed seriously when bones and skin is left at the site!

VOLUNTARY DEVELOPMENTS /INVESTMENTS

- COMMUNITY INVESTMENT – We donate school stationary supplies for the local school through the SCI Blue Bag system in the amount of **N$54,000** per annum, buy uniforms for community game scouts and community camp staff to the value of **N$84,500**.
  We donate the trophy hunting camp which was built at a cost of **N$994,280** after a three-year period, back to the community and lease it from them so they can generate a monthly income from the trophy hunting camp. All maintenance is done by the Trophy Hunting Operator. The trophy hunting camp consist of 4 x client tents, dining area, kitchen tent, and 5 staff tents to the community.

The Daily Rent paid to the community in the Trophy Hunting Camp is **N$350** per person per day visiting.

- WILDLIFE WATER POINT DEVELOPMENT - Drilling and maintaining of the boreholes in the concession to establish Permanent Wildlife Water Points is a crucial part of the concession development as water allows the elephants to become resident in the concession compared to the previous yearly migration into the concession when the natural pans fill up with water during the rainy season. After which the elephants move back into Khadoum National Park and Nyae Nyae Conservancy where there is Permanent Wildlife Water Points.

  Currently 4 PWWP's (Permanent Wildlife Water Point's) have been established at a cost of **N$905,131** in the N#a Jaqna Concession Block.

  Installation of solar pump for water supply to the community members is also a crucial part of the community development program. Community members feel they are rewarded by the Conservation Developments when they receive fresh clean drinking water at their villages. This results in Wildlife Water Points being left alone and not damaged or settled around them, which chases the game away. **Attachment 1 – Wildlife Water Point Development Schedule**

- COMMUNITY EMPLOYMENT - We permanently employ 5 Community Members as Camp Staff, and 10-20 community members as Casual labor in the concession. The Casual Workers are employed 10 months per year to open roads in the concession, open the concession boundaries (Cutlines), and to skin elephants when hunted. The Permanent Staff gets a basic salary of N$2,000 per month which totals to **N$120,000** per annum.
  The Casual workers get a monthly salary of N$1,350 per month. On average **N$180,000** salary is paid per annum to Casual Workers who are community members, which is a great inflow of funds in the poor community.

- ANTI POACHING PROGRAM – Establishment of Wildlife Water Points is the first and most crucial development in the concession so that existing game becomes resident in the concession! After Permanent Wildlife Water Points (PWWP's) are established we start our Anti-Poaching program to protect the PWWP Equipment as well as the existing game. Currently all personnel are utilized as anti-poaching staff when no safaris take place. Community Game Scouts are on permanent anti-poaching patrols. Equipment and funding remain the biggest challenges as equipment is expensive.

  A serious Anti-Poaching program is needed. Funding major constraint, as Operator is spending every possible cent in the development of Wildlife Water Points. The idea is to establish the wildlife water points first so that there is permanent water in the concession, then start with an intensive Anti-poaching program. Mobility is a serious constraint in the anti-poaching effort as the area is

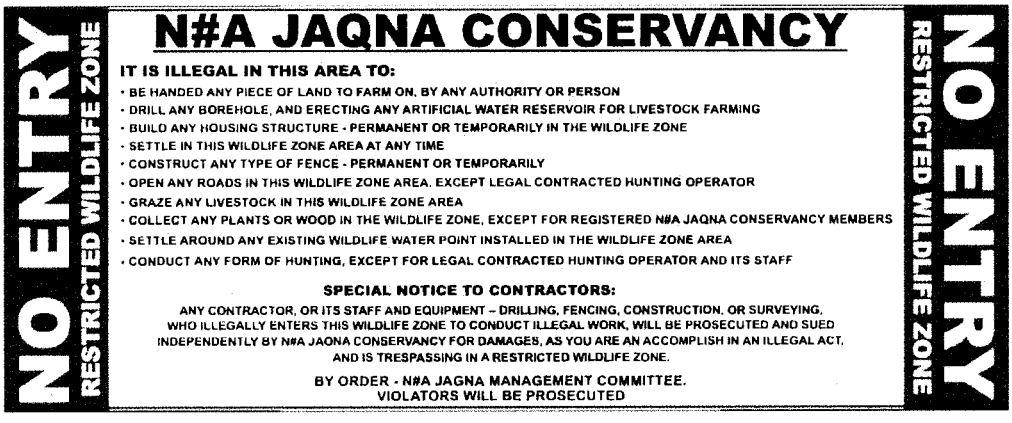
2,25 million acres big. In order to cover the concession properly four-wheeler quad bikes are needed, as well as several anti-poaching bases especially on the northern, and southern borders of the concession area, and radio communication equipment.

Now funding is done from Operators personal funds, and some small donations by hunters. We applied for a Grant from the DSCF (Dallas Safari Club Foundation) and will hopefully receive much needed funds to run a proper anti-poaching and PWWP establishment program. However, our Guides move around a lot in the area, visiting villages, and water holes to discourage poaching. With very positive results as much more game is visible since we got the concession in 2016, because of a higher visibility in the concession, hence less poaching.

However Solar Panels have been stolen by poachers on horseback on our southern border. Which means they come in from our neighboring Ondjou Conservancy as the San people are nomads without horses and livestock. To prevent any further theft, we installed trail cameras powered by a solar panel, and put up 12 feet high on a steel post with barbed wire around the pole preventing thieves to climb up the pole to destroy the cameras. It is small communities, so it will be easy to catch the perpetrator once we have their photos taken!

This area could be a dream concession if funding is available to drill for more water holes, open roads to be able to run an intensive anti-poaching program, and re-introduce game species shot out by the previous SA Army, neighboring and local poachers, i.e. red hartebeest, springbuck, Burchell's zebra, roan, sable, blue wildebeest, and warthog occurred in herds of thousands with none left today.

- NO ENTRY SIGNS



SIGN PERMISSION LETTER

Thormahlen & Cochran Safaris asked for permission to put up NO ENTRY signs at strategic positions to stop illegal land grabbing, and illegal drilling in the concession.

Approval was given by the N#a Jaqna Conservancy Management Committee and the first phase of the signs project is nearly completed. The first phase will be completed in 2019, and the secondary phase will be completed partly in 2019, and finally in 2020 due to the excessive logistics to put the signs up over the whole concession, the and the huge cost of the signs

December 5, 2017

The Chairperson
Me. Sarah Sungu
Conservancy Management Committee
N#a Jagna Conservancy
Mangetti Dune

Dear Sir/Madam

RE: LETTER-CHANGE OF CURRENT "NO ENTRY" SIGNS WORDING

We refer to the meeting held between N#a Jagna Management Committee and Trophy Hunting Operator Thormahlen & Cochran Safaris Namibia Pty Ltd on 1 December, 2017 at the N#a Jagna Conservancy Office at Mangetti Dune.

During our meeting the current NO ENTRY Signs placed at Border Cutlines entry points between Nohma and Nyae Nyae conservancy, were discussed. The Nyae Nyae conservancy as well as the Nohma San Community raised their concern regarding the NO ENTRY signs as they felt that the purpose was to keep San people from these two communities out of the N#a Jagna conservancy.

Thormahlen & Cochran explained in detail that the signs were placed to safeguard the conservancy Wildlife Areas land from the possibility of people from outside the San community illegally entering and building houses, or fencing the Wildlife areas due to the new roads and borders being opened. The N#a Jagna Management Committee

The N#a Jagna management Committee agreed with the Trophy Hunting Operator that this is a big threat considering the illegal land grabbing going on in the Conservancy. It was agreed that additional information will b added onto the existing NO ENTRY signs so that the San communities can feel free to move into and out of the areas.

N#a Jagna Conservancy Management Committee undertook to meet and decide on the additional information's wording, and that the Management Committee will inform Thormahlen & Cochran Safaris Namibia accordingly so that the correct sign information can be added by the Trophy Hunting Operator.

Thormahlen & Cochran Safaris will pay for the additional information needed to be added to the current NO ENTRY Signs, as well as the installation thereof.

We trust that our request will be looked at favorably for both the N#a Jagna Conservancy community, as well as the Trophy Hunting Operator of N#a Jagna Conservancy.

Thank you

Peter Thormahlen
CEO-Thormählen & Cochran Safaris Namibia Pty Ltd

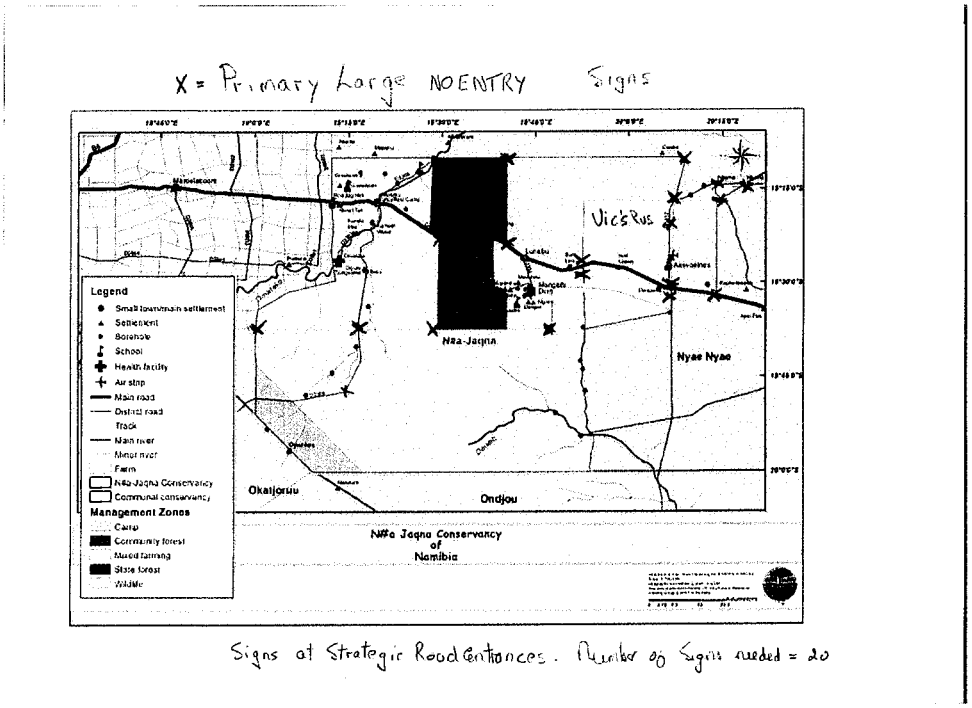
PRIMARY SIGNS

In order to stop the illegal settling and land grabbing of land in the Wildlife Zones of the N#a Jaqna Conservancy, Thormahlen & Cochran Safaris designed NO ENTRY signs with the written permission of the N#a Jaqna Management Committee.

Twenty Primary (Large) Signs will be put up at Strategic points - strategic roads and ploints where illegal land grabbers enter the Wildlife Zones to drop off workers, material, and equipment. It is especially important to have these signs visible so that Drilling Contractors can see them when illegally entering the Wildlife Zones, to illegally drill boreholes for illegal settlers.

A Special Notice on the sign refers to **Drilling Contractors** Illegally entering, and drilling in the Wildlife Zone.

"Ignorance is not an excuse to break the law", according to our Laws in Namibia.



Signs at Strategic Road Entrances. Number of Signs needed = 20

Thus, by putting the signs at strategic entrances to the Wildlife Zone Areas, there is no excuse for a contractor of any kind, to enter a Wildlife Zone. When the signs are put up, a newspaper is used to establish the date when the sign was erected. No excuse as to when the illegal settlers entered the Wildlife Zone.

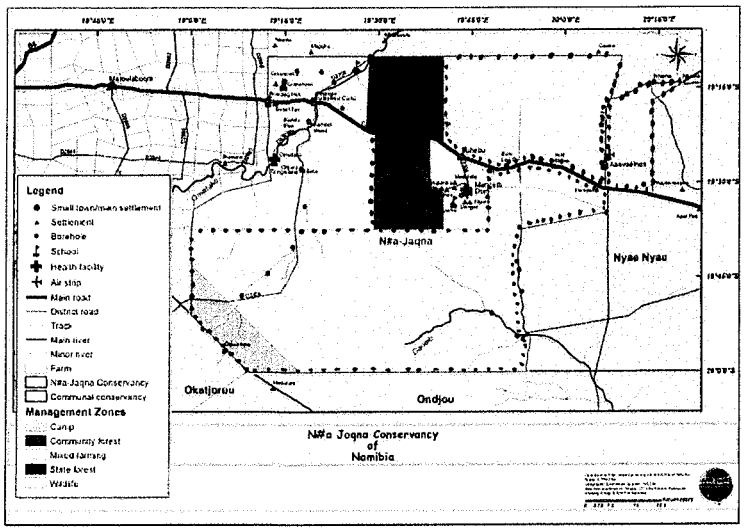
Thormahlen & Cochran Safaris is consulting with Lawyers in Windhoek in order to send a Legal Notice per registered mail, to all Drilling Contractors in Namibia, indicating the Wildlife Zone Areas in N#a Jaqna.

In the event any Drilling Contractor enters a Wildlife Zone to drill, we will get a Court Order against them to prohibit them from drilling boreholes in the Wildlife Zones, as they are obstructing our Contractual Obligation to develop the Wildlife Zones for Game.

It will be much easier, more efficient, and achieve better results, to go after the core of the illegal settling – the Drilling Contractors – than try and evict illegal land grabbers!

SECONDARY SIGNS

In order to have signs visible along all roads and borders of the N#a Jaqna Wildlife Zones, Thormahlen & Cochran Safaris will also erect smaller (Secondary) NO ENTRY signs Five Kilometres apart. Around 150 signs & frames will be needed for this exercise.



Without water no illegal settling can take place, as no one can farm without water for human and livestock!!

Drastic and outside the box measures, and funding, are needed to stop the illegal settling in the N#a Jaqna Conservancy Wildlife Zone.

COST OF CURRENT NO ENTRY SIGNS - 2018

- Invoice 10 x Primary Signs – N$9,890
- Invoice 26 x Secondary Signs – N$11,143.50
- Cost of Steel for 36 x Frames @ N$955 ea – N$35,820
- Welding Rods @ 5 kg -N$600
- Petrol for Generator to weld @ 200 litre – N$3,200
- Labour to manufacture Frames x 6 days x 2 staff @ N$75 ea pd – N$900
- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$3,000
- Cement x 10 bags @ N$100 – N$1,000
- Staff Labour to put up signs x 5 days x 2 staff @ N$75 pd ea – N$750
- Guide C Joubert Labour to put up signs x 5 days @ N$500 pd -N$2,500
- Vehicle to put up signs x 1,500 km @ N$6 per km -N$9,000

TOTAL COST TO PUT UP CURRENT SIGNS – N$77,803

PROJECTED COST OF FUTURE NO ENTRY SIGNS

- Invoice 10 x Primary Signs – N$9,890
- Invoice 130 x Secondary Signs – N$55,717.5
- Cost of Steel for 130 x Frames @ N$955 ea – N$129,350
- Welding Rods @ 25 kg -N$3,000
- Petrol for Generator to weld @ 1,000 litre – N$16,000
- Labour to manufacture Frames x 21 days x 2 staff @ N$75 ea pd – N$3,150
- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$10,500
- Cement x 50 bags @ N$100 – N$5,000
- Staff Labour to put up signs x 25 days x 2 staff @ N$75 pd ea – N$3,750
- Guide C Joubert Labour to put up signs x 25 days @ N$500 pd -N$12,500
- Vehicle to put up signs x 2,500 km @ N$6 per km -N$15,000

TOTAL PROJECTED COST TO PUT UP FUTURE SIGNS – N$263,857.50

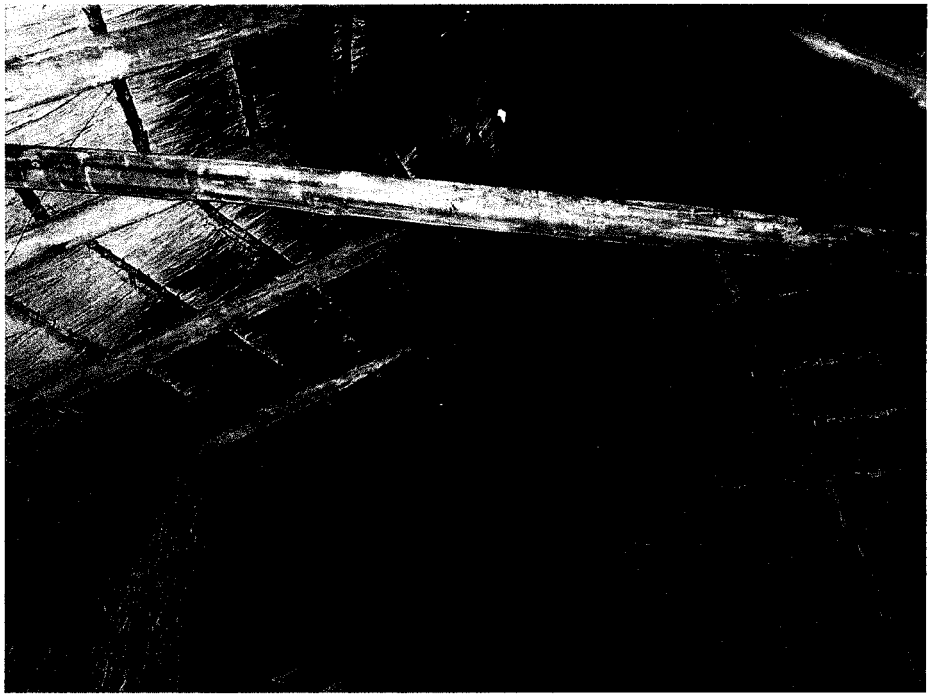
- CAMP DINING AREA REPERATION COST

COST CALCULATIONS

- Vehicle Cost -N$6,480
- Thatching Grass – N$25,000
- Trailer Rental Cost – N$6,800

- Thatching Cost – N$3,000
- Thatcher Salary -N$4,500
- Casual Workers' Salaries -N$22,500
- PH Salary -N$15,000

TOTAL REPERATION COST – N$83,280



- N#A JAQNA AIRSTRIP REHABILITATION

Thormahlen & Cochran Safaris strive to develop the N#a Jaqna conservancy as much as possible. The N#a Jaqna Airstrip at Mangetti Dune was built by the South African Military during the Bush War period in Namibia. The airstrip is a huge asset, just being neglected, and is worth millions of Namibian Dollars if it had to be built today.

Instead of using the Tsumkwe Airstrip in Nyae Naye Conservancy, we opted to rehabilitate the Mangetti Dune airstrip. The Cost to rehabilitate the Airstrip is huge, but is worth it for us, as we feel that we must fly our clients into the concession where they hunt. The location of the Airstrip close to Mangetti Dune enables us to let clients see and experience the Mangetti Dune community.

We finished clearing the Airstrip, removed all trees and obstacles that gathered over the last 28 years since the end of the war.

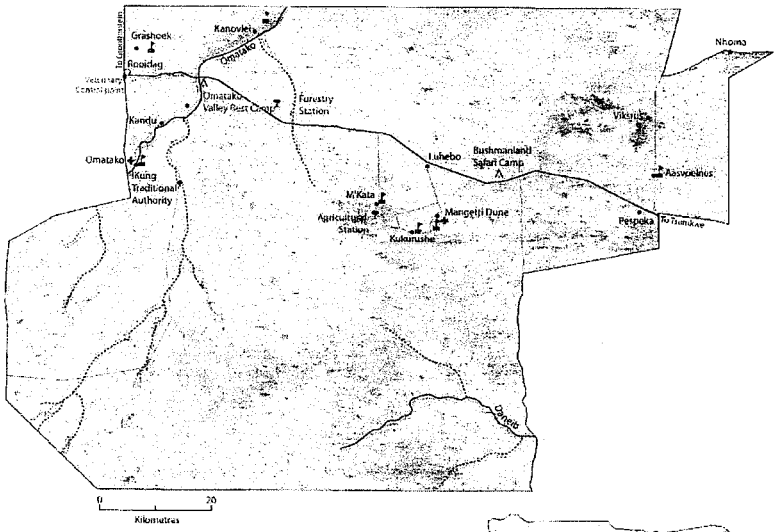
AIRSTRIP REHABILITATION COST-2018

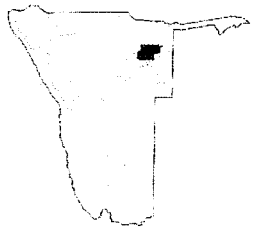
- Casual Labor Cost – N$54,000
- Grader Cost – N$6,000
- Vehicle Cost -N$40,000
- Big Game PH Salary Cost – N$50,000
- Steel Wire to fence off Airstrip for Airplane Safety – N$33,000
- Anchor Poles – N$12,000
- Dropper Poles – N$21,700
- Trailer Rental -N$8,500
- Steel Gate – N$1,000
- Windsock -N$3,500
- Windsock steel post -N$1,000
- Cement -N$2,000
- Molopo Tree Poison – N$3,600

TOTAL AIRSTRIP COST – N$236,300

d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:

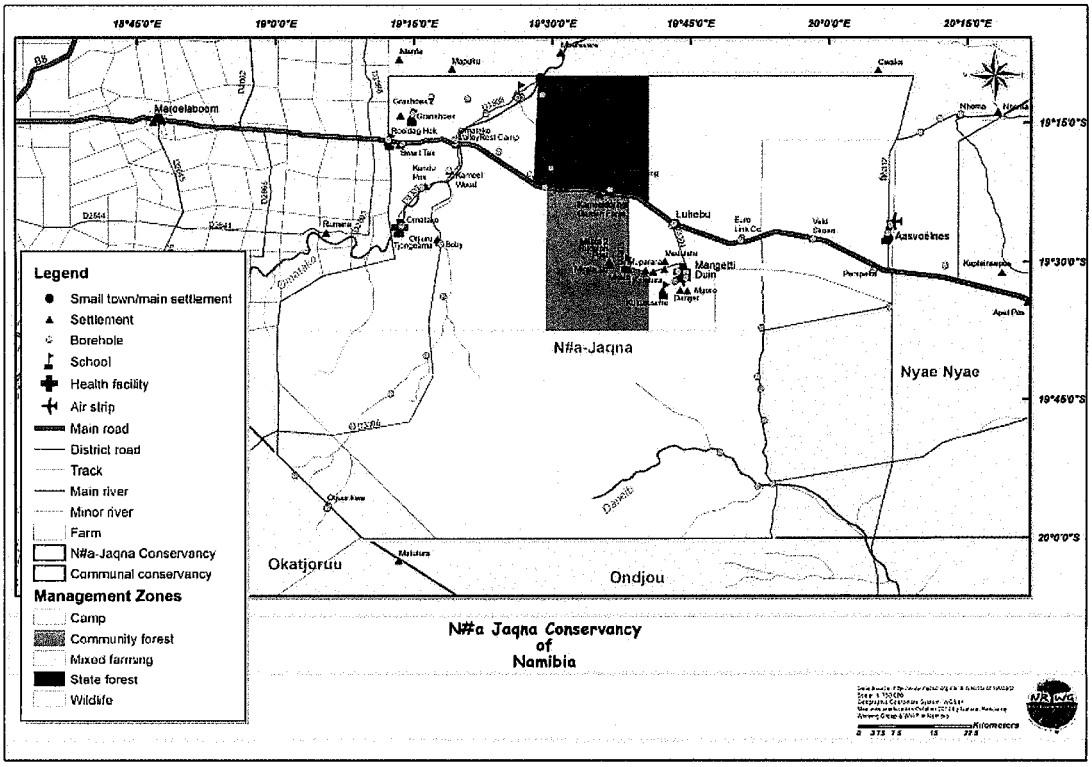
Concession Location: Located in the Bushmanland of Namibia.
South of the Kavango Region boundary of Namibia
West of Nyae Nyae Conservancy block
North of Ondjou Conservancy block
Closest Town: Tsumkwe town in Nyae Nyae conservancy
Closest City -Windhoek the capitol of Namibia which is 650 km away.





N≠A-JAQNA
(named after the buffalo thorn tree)

Registered	July 2003
Address	N≠a-Jaqna Conservancy P.O Box 1049, Grootfontein
Telephone	067 245047
Approximate population	7,000
Main home language	Ju/'hoansi
Area	9,120 square kilometres
Region	Otjozondjupa
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 staff at present; two game guards trained in trophy hunting, monitoring and data collection techniques; wildlife monitoring using Event Book monitoring system
Enterprises	Omatako Valley Rest Camp (community rest camp); Grashoek Cultural Village; crafts; trophy hunting; own-use hunting; dry wood harvesting project; devil's claw harvesting.
Support agencies	MET,WIMSA (main support NGO), NNF, LAC, WWF In Namibia, CRIAA, ICEMA, NNDFN


18°45'0"E
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19°15'0"S
19°30'0"S
19°45'0"S
20°0'0"S
Maroelaboom
Luhebu
Mangetti Dune
Aasvoëlnes
N#a-Jaqna
Nyae Nyae
Okatjoruu
Ondjou
Legend
Small town/main settlement
Settlement
Borehole
School
Health facility
Air strip
Main road
District road
Track
Main river
Minor river
Farm
N#a-Jaqna Conservancy
Communal conservancy
Management Zones
Camp
Community forest
Mixed farming
State forest
Wildlife
N#a Jaqna Conservancy
of
Namibia

The N#a Jaqna block is number 29 on the below map.

e. If the concession borders a national park, please provide the park name: Concession does not border the Khaudum National Park, but lies 30 km south west of the Park

f. Description of general and distinctive habitat features and any water features:

Habitat:

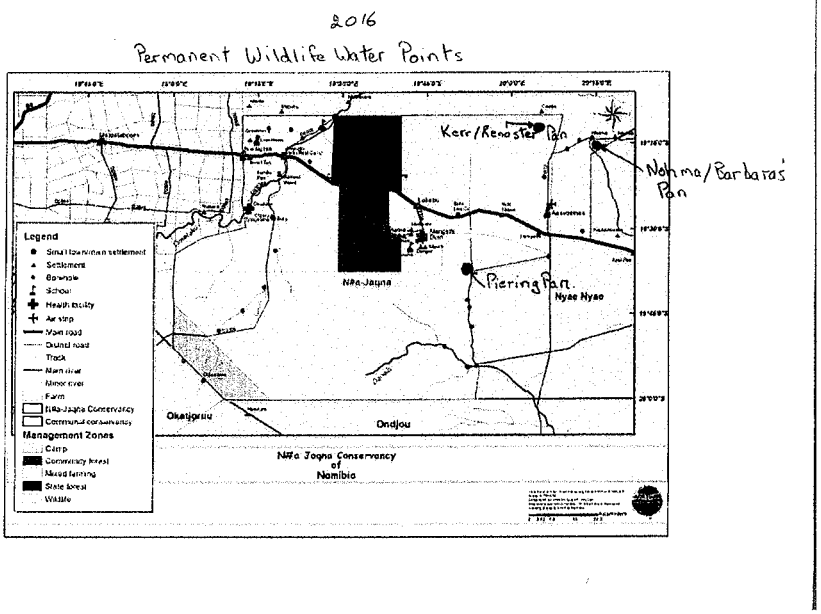
Average annual rainfall of 400-450 mm.

Kalahari sands cover flat landscape of broadleaf and acacia woodland.

Prehistoric dunes formed by Eolic sands blown in from the west coast of Namibia offers excellent habitat of broadleaf trees, yearly grass, rose thorn and raisin bush on the dunes while the area between the dunes ("dune streets") have plenty of climax grass species, black & white thorn acacia, and silverleaf terminalia trees offering a big variety of food for herbivores (browsers) as well as elephant. Some huge grass plains exist in the concession making it the ideal habitat for grass feeding species like springbuck, Burchell zebra, and red hartebeest as well as predators like cheetah which needs open spaces to hunt.

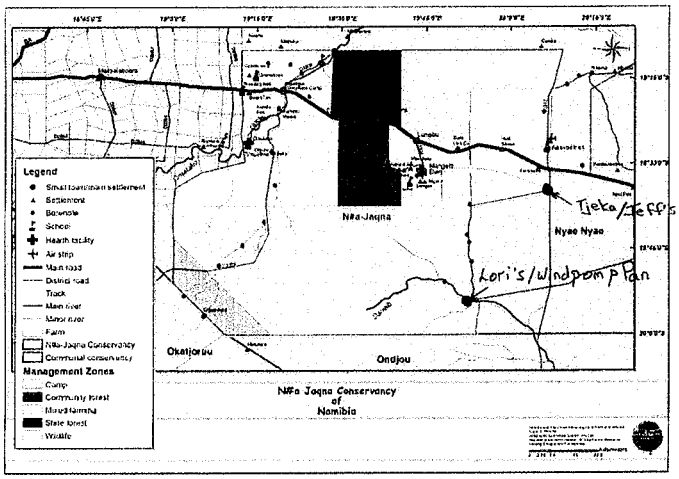
Water Features:

A number of Permanent Wildlife Water points (PWWP's) have been established in the N#a Jaqna Concession Block since 2016 when we started operating in the block.



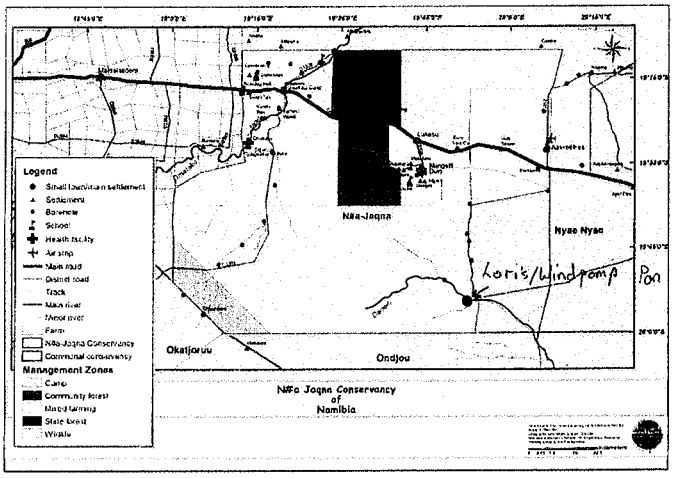
2017

Permanent Wildlife Water Points



2018

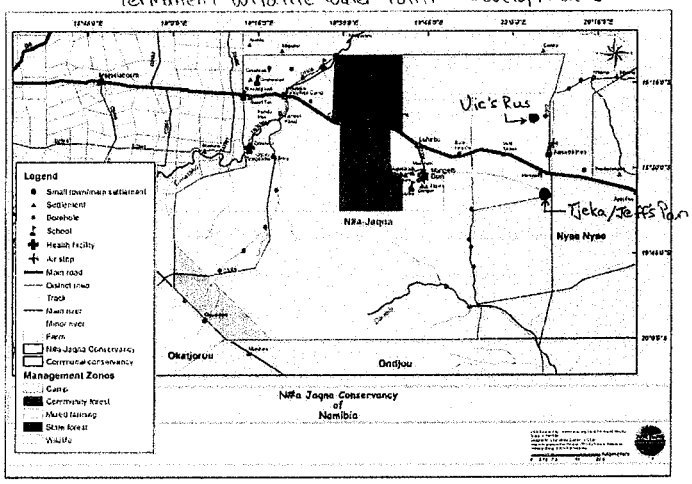
Permanent Wildlife Water Points



Lori's Pan Repaired and Solar System re-installed

2019

Permanent Wildlife Water Point Developments



Jeffs / Tjeka Pan - Cement Dam
Vic's Rus - Solar Pump & Cement Dam

TOTAL WATER DEVELOPMENT COST – 2018

Thormahlen & Cochran Safaris removed the entire Solar Panels and Pump at Lori's Pan and transported it back to Windhoek to be repaired.

Total invested in Wildlife Water Points in 2018 in N#a Jagna Conservancy is:

- Company Vehicle Transportation of Solar's to Windhoek and back – N$19,536
- Repair Cost at Cedar Solar – N$26,000
- Cement Cost – N$1,000
- Casual Labour Cost – N$6,000
- PH Labour Cost – N$11,666
- Steel Pipe, Welding Rods, Grinder blades etc. – N$1,200
- Petrol for Generator Welder– N$4,000
- Trailer Rental -N$13,600

TOTAL COST INCURRED 2018– N$83,002

Total Invested in Wildlife water Points from 2016-2018 in N#a Jaqna Conservancy:
Wildlife Water Point Cost 2016 – N$590,129
Wildlife Water Point Cost 2017 – N$232,000
Wildlife Water Point Cost 2018 – N$83,002
TOTAL COST INCURRED 2016-2018 – N$905,131

3. Are there any communities living in the concession? _X_ Yes __ No

   a. If so, estimated number of people or villages in the concession?

   Approximate San (Bushman) Population- 7,000

4. Are there communities bordering this concession? _X_ Yes __ No

   a. If so, estimated number of people or villages around the concession?

   Approximate Populations:
   Nyae Nyae Conservancy on Eastern border- 2,300 San tribe
   Ondjou Conservancy on southern border- 2,000 Otjiherero tribe
   Kavango Region on northern border– Cattle Farms -Kavango tribe
   Western Border- Cattle Farms – Mostly White Farmers

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	Dense	450-550	Rapidly Upwards due to PWWP (permanent wildlife water point) installations	Trail cameras at Water Points /Game Scout Sightings / Sightings by Hunting Guides / Tracks /MET
Lion	None	None	None	N/A
Leopard	Abundance	112-120 Average territory size is 8,000 ha	Stable	Trail Cams /Tracks/Sightings in Daytime
Cheetah	Sparse	20	Stable over last 3 years. Would like to relocate some cheetah with into the concession with collars when more game is available	Tracks / Sightings
African Wild dog	Dense	22-25	Stable over last 3 years. Would like to collar some Wild Dog when more game is available	Tracks/Sightings on the road and at waterholes
Caracal	Dense	100 +	Stable	Tracks / Sightings
African Wildcat	Dense	100 +	Stable	Tracks / Sightings
Spotted Genet Cat	Dense	100 +	Stable	Tracks / Sightings
Spotted Hyena	Average	30 +	Stable	Tracks / Sightings / Trail Cams

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Brown Hyena	Dense	75 +	Upwards	Tracks / Sightings / Trail Cams
Giraffe	Sparse	4-5	Stable	Tracks/Sightings
Cape Eland	Average	400 +	Upwards	Tracks/Sightings
SG Kudu	Sparse	100	Stable	Tracks/Sightings
Blue Wildebeest	Sparse	20	Stable	Tracks / Game Scouts
Steenbuck	Dense	1,000	Stable	Sightings / Tracks
Common Bush Duiker	Dense	1,000	Stable	Sightings / Tracks
Gemsbuck	Average	400 +	Upwards	Sightings / Tracks
Roan Antelope	Sparse	32 - 37	Upwards – Roan coming in from Nyae Nyae due to PWWP's installed on our Nyae Nyae border	Sightings / Tracks
Porcupine	Abundance	1,000 +	Stable	Sightings / Tracks
Guineafowl	Abundance	1,000 +	Stable	Sightings / Tracks
Francolin	Abundance	2,000 +	Stable	Sightings / Tracks
Doves	Abundance	10,000 +	Stable	Sightings / Tracks

6. Total employment number:

   Permanent Camp Staff – 6

   Casual Workers -20

   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	6	2
Trackers	7	1
Anti-poaching scouts/rangers	Scouts -8 / Anti-poaching - 8	8
Other anti-poaching	Anti-poaching Casuals -20	20
Cooks/housekeepers	Cook / Housekeepers - 2	2
Community coordinators	Management Committee - 9	9
Managers	2	1
Biologists		
Skinner	1	1
Tracker & Trainee Guide	1	1
Camp Attendant	1	1

7. Number of staff employed in the off-season:

   Camp Staff Permanently employed – 6

   Community Game Scouts employed -8

   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	Community Game scouts x 8	8	Jan-Dec
Casuals Anti-Poaching Staff	Casual Workers x 20	20	Dec-Feb
Managers	2	1	Dec-Feb
Maintenance			
Road opening/construction	Casuals x 20	20	March-Nov
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff:

      Community Game Scouts – Permanent -8

      Casual Anti-poaching Squad - 20

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? During & Off Seasons patrols are done on foot, and with landcruiser vehicle.

   c. Months during which anti-poaching patrols are conducted: Jan - Dec

   d. Number of anti-poaching patrols per month: 4

   e. Description of anti-poaching equipment, vehicles, etc.: Operator allocates a landcruiser hunting vehicle to anti-poaching during the off season. Done mostly on foot during the

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

hunting season, plus guides moving around in the concession during the hunting season. **Need funding to buy four-wheeler quad bikes**

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Operator & Conservancy Management Committee

g. Do you offer rewards to poaching informants leading to arrest? _X_ Yes __ No

h. Do you offer rewards to poaching informants upon conviction? _X_ Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **Namibian Dollar – N$**

Type of expense	Spending 2016	Spending 2017	Spending 2018	Remarks
Salaries for anti-poaching scouts	Game Scouts: 8 @ N$1,000 pm -N$96,000 Casual Team: 20 @ N$1,000 pm - N$40,000	Game Scouts: 8 @ N$1,000 pm -N$96,000 Casual Team: 20 @ N$1,000 pm - N$40,000	Game Scouts-: 8 @ N$1,000 pm N$96,000 Casual Team-: 20 @ N$1,000 pm N$40,000	Game Scouts-12 months Casual Scouts – 2 months
Equipment-Uniforms	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	Scouts x 8 Casuals x 20
Vehicles	N$20,000@ N$10 ,000 per month	N$20,000@ N$10 ,000 per month	N$20,000@ N$10 ,000 per month	Monthly cost of allocating land cruiser to anti-poaching
Diesel	N$50,000	N$50,000	N$50,000	
Rewards paid	-	none	none	
Other: _____	-			
Other: _____	-			
TOTALS	N$332,000	N$332,000	N$332,000	

9. Anti-poaching results:

Category	2016	2017	2018	Remarks
Poaching incidents discovered	13	9	4	Meat poachers
Ivory poachers arrested	none	none	none	No ivory poachers yet
Meat poachers arrested	none	none	3	Eland & Gemsbuck poached
Other poachers arrested	none	none	none	-
Poachers convicted	none	none	3	Locals -took them to tribal court where they got fines
Snares/gin traps collected	0	1	0	Poachers hunt with horses and on foot with dogs
Firearms confiscated	none	none	none	Spears & Bow Arrow
Vehicles confiscated	none	none	none	-
Bicycles confiscated	none	none	none	-
Boats/nets confiscated	-	-	-	-
Tusks recovered	N/A	N/A	N/A	No Ivory poaching yet
Carcasses observed	2	1	1	Gemsbuck & Eland
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? _X_ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution

Communities gets 100% of money contributed by Hunters for non-exportable game (Own Use Quota). The Donation for a Non-Exportable elephant is US$15,000 of which US$3,500 goes to the community, and the rest is used to establish PWWP's in the concession as wildlife water points is our primary development goal. Without water the concession is just a "Green Desert" because all surface water seeps into the sandy soil. Two non-exportable elephant is on quota yearly. The Communal fee is a contractual fee.

Our clientele is primarily USA citizens who donate SCI Blue Bags with school stationary supplies. Each hunter hunting in the conservancy donates between one and two SCI Blue bags with school stationary at a value of US$200 each bag. Hence a minimum of 5-10 SCI Blue Bags is donated at a value of N$13,500 to N$27,000. The SCI Blue Bag donations is a Voluntary fee.

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

c. Does the company provide game meat to nearby communities? _X_ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:

All the meat from trophy animals hunted, as well as the two Own Use Elephants on quota, must be delivered to community villages in the concession within 24 hours. The Conservancy Management Committee hands the trophy hunting operator a list of villages that need to get meat. Every villages have a representative that has to sign for the meat when delivered.

This is an Obligation stipulated in the Trophy Hunting Agreement. Failure to do so is punishable with a fine of N$22 per kilogram of the average carcass weight of the different animals. Failure to pay the fine is a breech of contract with immediate suspension.

Meat Value – N$:
Elephant x 4 @ 4,500 kg carcass weight @ N$22 / kg = N$396,000
Eland x 1 @ 350 kg carcass weight @ N$22 /kg = N$7,700
Gemsbuck x 2 @ 100 kg carcass weight @ N$22 = N$4,400
Warthog x 1 @ 30 kg carcass weight @ N$22 /kg = N$660
Steenbuck x 4 @ 7 kg carcass weight @ N$22 /kg = N$616
Duiker x 2 @ 10 kg carcass weight @ N$22 / kg =N$440
Total Annual Meat Value = N$409,816.00

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.

Very little fields in the concession area. Up till now no PAC animals declared.

The N#a Jaqna Concession block is not a horticulture area, and very little crops are raised. Mainly cattle, goats, donkey, and horses are raised by community members.

When an elephant damages any property, problem elephant situations are raised by the local community and it is addressed with the Chairman of the Community. The chairman then reached out to the Minister of Environmental and Tourism, who investigates the Wildlife Human conflict, and approves the problem animal permit in writing when enough evidence is collected by the Ministry. The Chairman then reached out to the Hunting Operator to provide a client. If a suitable client is found, there is a certain time limit to hunt the animal and the permit will be issued with the client's details.

The Operator must pay the community a predetermined contractual fee for the problem animal, and the meat has to be distributed to villages on the meat delivery list as per contract

f. Please describe any consolation payments made to residents damaged by game species. What currency are the expenditures reported in?

No consolation payments made to residents as the only cattle in the concession is owned by illegal landgrabbers. Court eviction case was won by the Conservancy in November 2017, some of the illegal farmers left, but some is still hanging in there. Any damages on livestock is welcomed by the San community in the concession.

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	N/A			
Lion	N/A			
Leopard	N/A			
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **Namibian $**

Type of project	Spending 2016	Spending 2017	Spending 2018	Remarks
Education (e.g., classrooms, offices)	-	-	-	-
Education (e.g., school fees, supplies)	N$125,000	N$125,000	N$125,000	School Stationary donations to the communal schools
Health (e.g., clinics, offices)	-	-	-	-
Health (e.g., medical salaries, equipment)	-	-	-	-
Community scout salaries	Casual Team: 20 @ N$1,000 pm - N$40,000	Casual Team: 20 @ N$1,000 pm - N$40,000	Casual Team: 20 @ N$1,000 pm - N$40,000	Casual Scouts – 2 months employed in off season
Other community anti-poaching- Uniforms	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	Scouts x 8 Casuals x 20
Local government activities	-	-	-	-

Water infrastructure improvements	- N$590,129	N$232,000	N$83,002	Wildlife Water Points
Sports teams funded	N$4,500	N$4,500	N$5,000	Soccer Team Uniforms
Construction materials donated	N$994,280	N$0	N$83,280	Trophy Hunting Camp, which is donated back to community at end of 2018 to lease to operator
Salaries & Training Camp Staff	N$621,320	N$375,000	N$303,000	Training and Salaries done
Trophy Fees Paid to Community	N$916,891.53	N$880,170.00	N$838,880	Trophy Fees for Game
Meat Delivered	N$409,816.00	N$409,816.00	N$409,816.00	Meat Delivered
Airstrip Rehabilitation	-	-	N$236,300	
TOTALS	**N$3,827,936**	**N$2,192,486**	**N$2,013,978**	

EXECUTIVE INVESTMENT / COST SUMMARY

TOTAL SALARIES & TRAINING COST- 2018

Thormahlen & Cochran Safaris spent the following amounts on training and labour in 2018:

- **Training of Camp Staff-N$75,500**
- **Camp Staff Salaries – N$120,000**
- **Casual Labour Salaries – N$108,000**
- **TOTAL COST – N$303,000**

TOTAL WATER DEVELOPMENT COST – 2018

Thormahlen & Cochran Safaris removed the entire Solar Panels and Pump at Lori's Pan and transported it back to Windhoek to be repaired.

Total invested in Wildlife Water Points in 2018 in N#a Jagna Conservancy is:

- Company Vehicle Transportation of Solar's to Windhoek and back – N$19,536
- Repair Cost at Cedar Solar – N$26,000
- Cement Cost – N$1,000
- Casual Labour Cost – N$6,000
- PH Labour Cost – N$11,666
- Steel Pipe, Welding Rods, Grinder blades etc. – N$1,200

- Petrol for Generator Welder– N$4,000
- Trailer Rental -N$13,600

TOTAL COST INCURRED – N$83,002

Total Invested in Wildlife water Points from 2016-2018 in N#a Jaqna Conservancy:
Wildlife Water Point Cost 2016 – N$590,129
Wildlife Water Point Cost 2017 – N$232,000
Wildlife Water Point Cost 2018 – N$83,002
TOTAL COST INCURRED 2016-2018 – N$905,131

Proposed Wildlife Water Point Investment on Tender:
Wildlife Water Point Cost Proposed 2016 -N$200,000
Wildlife Water Point Cost Proposed 2017 -N$250,000
Wildlife Water Point Cost Proposed 2018 -N$250,000
TOTAL PROPOSED WWP COST – N$700,000
(WWP-Wildlife Water Point)
This leaves us with a credit balance of N$204,631 compared to our proposed goal of N$700,000 in the first three years.

"NO ENTRY" SIGNS COST - 2018

- Invoice 10 x Primary Signs – N$9,890
- Invoice 26 x Secondary Signs – N$11,143.50
- Cost of Steel for 36 x Frames @ N$955 ea – N$35,820
- Welding Rods @ 5 kg -N$600
- Petrol for Generator to weld @ 200 litre – N$3,200
- Labour to manufacture Frames x 6 days x 2 staff @ N$75 ea pd – N$900
- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$3,000
- Cement x 10 bags @ N$100 – N$1,000
- Staff Labour to put up signs x 5 days x 2 staff @ N$75 pd ea – N$750
- Guide C Joubert Labour to put up signs x 5 days @ N$500 pd -N$2,500
- Vehicle to put up signs x 1,500 km @ N$6 per km -N$9,000

TOTAL COST TO PUT UP CURRENT SIGNS – N$77,803

PROJECTED COST OF FUTURE NO ENTRY SIGNS

- Invoice 10 x Primary Signs – N$9,890
- Invoice 130 x Secondary Signs – N$55,717.5
- Cost of Steel for 130 x Frames @ N$955 ea – N$129,350
- Welding Rods @ 25 kg -N$3,000
- Petrol for Generator to weld @ 1,000 litre – N$16,000
- Labour to manufacture Frames x 21 days x 2 staff @ N$75 ea pd – N$3,150

- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$10,500
- Cement x 50 bags @ N$100 – N$5,000
- Staff Labour to put up signs x 25 days x 2 staff @ N$75 pd ea – N$3,750
- Guide C Joubert Labour to put up signs x 25 days @ N$500 pd -N$12,500
- Vehicle to put up signs x 2,500 km @ N$6 per km -N$15,000

TOTAL PROJECTED COST TO PUT UP FUTURE SIGNS – N$263,857.50

CAMP DINING AREA REPARATION COST

- Thatching Grass – N$25,000
- Vehicle Cost -N$6,480
- Trailer Rental Cost – N$6,800
- Thatching Cost – N$3,000
- Thatcher Salary -N$4,500
- Casual Workers' Salaries -N$22,500
- PH Salary -N$15,000

TOTAL REPERATION COST – N$83,280

N#A JAQNA AIRSTRIP REHABILITATION COST

- Casual Labor Cost – N$54,000
- Grader Cost – N$6,000
- Vehicle Cost -N$40,000
- Big Game PH Salary Cost – N$50,000
- Steel Wire to fence off Airstrip for Airplane Safety – N$33,000
- Anchor Poles – N$12,000
- Dropper Poles – N$21,700
- Trailer Rental -N$8,500
- Steel Gate – N$1,000
- Windsock -N$3,500
- Windsock steel post -N$1,000
- Cement -N$2,000
- Molopo Tree Poison – N$3,600

TOTAL AIRSTRIP COST – N$236,300

TOTAL DEVELOPMENT / INVESTMENT COST - 2018

TOTAL INVESTMENT - N$783,385

was invested in N#a Jagna conservancy in 2018 in order to develop the previously marginal concession into a prime trophy hunting concession.

We saw the potential and took the risk to invest an enormous amount of money, time, and labor into the concession in 2016. Something no trophy hunting operator was willing to do in the last 11 years prior to us getting involved. And it is paying off as huge amounts of game is moving into the area!!

- Wildlife water points x 5 are now operational with Solar Pumps Installed.
- Cutline's of over 50 km were made.
- An additional 40 km of Hunting Roads were cleared.
- A super luxury Trophy hunting camp was built.
- Camp is fully Operational.

With five San community members trained to run and manage

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.?

    We operate in South Africa and Namibia, and the figures below, is for the whole operation. In N#a Jaqna we only hunt what is allocated on quota, and it is fixed by the Government. The Namibian Government, specifically the Minister of Environment and Tourism, set strict quotas at the beginning of every three years, revising it at the end of each year when the Hunting operator must submit a Hunting Report on that specific year. So, before the client arrives, the hunting operator must take out a hunting permit – and this is only available if it falls within the quota that was pre-approved.

    Current N#a Jaqna Trophy quota: 2 x trophy elephant, 2 x own use elephant, 4 x Steenbuck, 3 x leopard, 2 x Oryx, 1 x warthog. 1 x duiker.

The table below is for the total of Thormahlen & Cochran's concessions:

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all other species
Number of U.S. clients	2015: 4 clients 2016: 9 2017: 5 2018: 4	2015: 2016: 2017: 2018: 1	2015: 2 clients 2016: 9 2017: 9 2018: 10	2015: 126 clients 2016: 110 2017: 141 2018: 83
Percentage of U.S. clients	2015: 99 % 2016: 98 % 2017: 100 % 2018: 98 %	2015: 2016: 2017: 2018: 100 %	2015: 100 % 2016: 98 % 2017: 99 % 2018: 100 %	2015: 95 % 2016: 96 % 2017: 97 % 2018: 95 %
Trophy fees paid by U.S. clients – US$	2015: $220,000 2016: $495,000 2017: $275,000 2018: $260,000	2015: 2016: 2017: 2018: $75,000	2015: $42,000 2016: $225,000 2017: $256,000 2018: $265,000	2015: $303,715 2016: $1,075,000 2017: $997,375 2018: $410,110

12. Dollar amount and percentage of the company's revenue from U.S. clients:

    95 %

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.

    ENHANCEMENT INFORMATION

    Hunting Policies:

    Elephant – Our Company policy is to hunt only bulls older than 55 years of age. We work hard not to hunt elephant under 50 years of age, irrespective if it is a Trophy Bull, or Own Use bulls. We would like to change the Own Use bulls on quota to Trophy Bulls as it is financially much more lucrative for both the community and the hunting Operator. At the moment Own Use Bulls is hunted with no payment towards the community. All monies made from the Own Use Bulls is invested back into the hunting concession by the operator for the instalment of Wildlife Water Points. Hunting post productive bulls ensures that the breeding is not disturbed and enhances trophy quality.

    We follow the Aging Policy adopted and used with great success by the APNR - Association of Private Nature Reserves which is the Private Reserves adjacent of the Kruger National Park. The APNR uses the Aging Policy of the Kruger National Park in South Africa with great success and accuracy to determine tusk weight and bull age.

    Leopard – Our Outfit policy is to hunt male leopard of only 8 years and older, with a minimum year boundary of 6 years of age. This ensures that the breeding males can breed till they are 8 years old, without any disturbance. It works well as our trophy quality in the N#a Jagna Conservancy is improving every year as we adopted this policy since we started in the concession in 2016. We also see much more big cats in the concession as it seems that by taking out the old males it gives the breeding males more freedom and less competition from post productive males.

    Resting Areas

    There are two huge areas in the center north and south of the concession that has no roads and is used as resting / breeding areas. The concern however is that these two areas are used by poachers to operate from. We decided to open roads in these two areas, however conduct no hunting in these two areas, yet do anti-poaching patrols to keep poachers at bay.

CONCESSION IMPROVEMENTS

Trophy Hunting Camp

Please see the Annual Report for a detailed cost outlay of the Trophy Hunting Camp built, and donated back to the community after the third year, so the community can lease it to us to create a yearly income from the asset.

Airstrip

There are 2 Military Airstrips in the N#a Jagna Conservancy, which was used by the South African Defense Force in the 80's – ONE AT the main village Mangetti Dune, and the second at another small village called Aasvoelnes. The Trophy Hunting Camp is located 19 kilometers from the airstrip at Mangetti Dune. We opened the airstrip , got permission to fence it off from the Traditional Authority, and graded it so we can charter our clients to this strip. Previously we are used the Tsumkwe airstrip in Nyae Nyae conservancy which is 70 km from the trophy hunting camp.

Roads

Please see Annual Report for Roads opened, and Cutlines (borders) opened between N#a Jagna Conservancy and Nyae Nyae Conservancies

Wildlife Water Points

Please see annual report for detailed outlay of Wildlife Water points installed in the concession.

Anti-Poaching Program

The N#a Jagna Conservancy Concession was a "green desert" up until we started operating in it. It was even advertised for closed bidding by the WWF as a "marginal" concession, with lot of challenges, i.e. illegal landgrabbers, illegal fencing, and no very limited water holes in the concession. The previous operator called "Eden Safaris", did nothing in the concession for 11 years it operated in the concession.

When we won the bid for the concession, we used own funds and drilled 2 strategic boreholes on the border with Nyae Nyae and the Kavango region. Within 10 months we had two resident herds of elephant and lots of other game – please see Annual Report for detailed outlay and maps. We also installed solar pumps at three existing boreholes to supply a constant supply of water which is very important to get game to become resident in the concession.

Our enhanced activity in the concession is deterring poachers at the moment, yet we see more and more horse and dog tracks as the poachers is entering from the neighboring Ondjou Conservancy, which is also one of our concessions we acquired at the beginning of this year! So we will have to start a very well-coordinated and managed anti-poaching program ASAP in both concessions. At the moment we use 20 casual workers to clear roads, and the same xasuals work as an anti -poaching squad during December, January and February while the season is closed (December & January), and in February we are still at the USA Hunting Conventions.

Our biggest constraint is funding! This concession is a pristine area of 2,25 million acres with the Wildlife Area being at least 750,000 acres big. The lack of funds is a big problem. We have approached SCI but they said they don't finance such programs. I am currently working on completing a Concession Grant Request to submit to DSCF- Dallas safari Club Foundation in the hope that we can get a grant to install more water points, open roads, and re-introduce game species so much needed by the San Community.

Up until then all our efforts are self-financed with contributions from hunters.

Restocking of Game

During the eighties locals, as well as white Namibian hunters say that Springbuck, Red Hartebeest, Warthog, Blue Wildebeest, Southern Impala, Ostrich, Eland, Tsessebe, Gemsbuck, Kudu, Giraffe, even Sable, and Roan occurred through the whole area in herds of hundreds and thousands. Today there are only eland, gemsbuck, and kudu left. We will have to re-introduce the species wiped out!

For that we need assistance with financing!

COMMUNITY UPLIFTMENT

SCI Blue Bag Donations

Thormahlen & Cochran Safaris prides ourselves that we motivate our clients to donate a " SCI Blue Bag" full of school stationary worth US$200 at a local school in the communal areas. Last year we donated around 70 blue bags at schools.

Food for School Children

Poverty in the Communal Areas is a way of live. It is disturbing to see school children who only get one meal a day at the school, consisting of grits and soya sauce. We have clients who donate funds towards the purchase of maize meal and soya sauce which we donate at the local schools so the children can be fed.

Meat Delivery

We pride ourselves that we deliver all meat, and intestines of all hunted animals within 24 hours to the list of villages supplied by the Management Committee. Even the remotest villages is served with meat to ensure that the community benefits from the hunted animals.

MANAGEMENT ACTIVITIES

RESEARCH

African Wild Dogs

There are around 22-25 African Wild Dogs in the N#a Jagna concession. We would like to put satellite collars on some of the dogs to be able to monitor their movement in the area. They are critically endangered as a species, and we would like to assist in securing their future by constantly monitoring them in our concession area. This will provide valuable research information as to their hunting success, and movement in the concession area.

Cheetah

A very small number of cheetah is present in the concession area. After securing the Wildlife Water Points; when re-located game species numbers are high enough, we would like to release cheetahs in the concession area. Some of the cheetah will also get satellite tracking collars to monitor and study their progress.

14. I declare that the foregoing is true and correct.

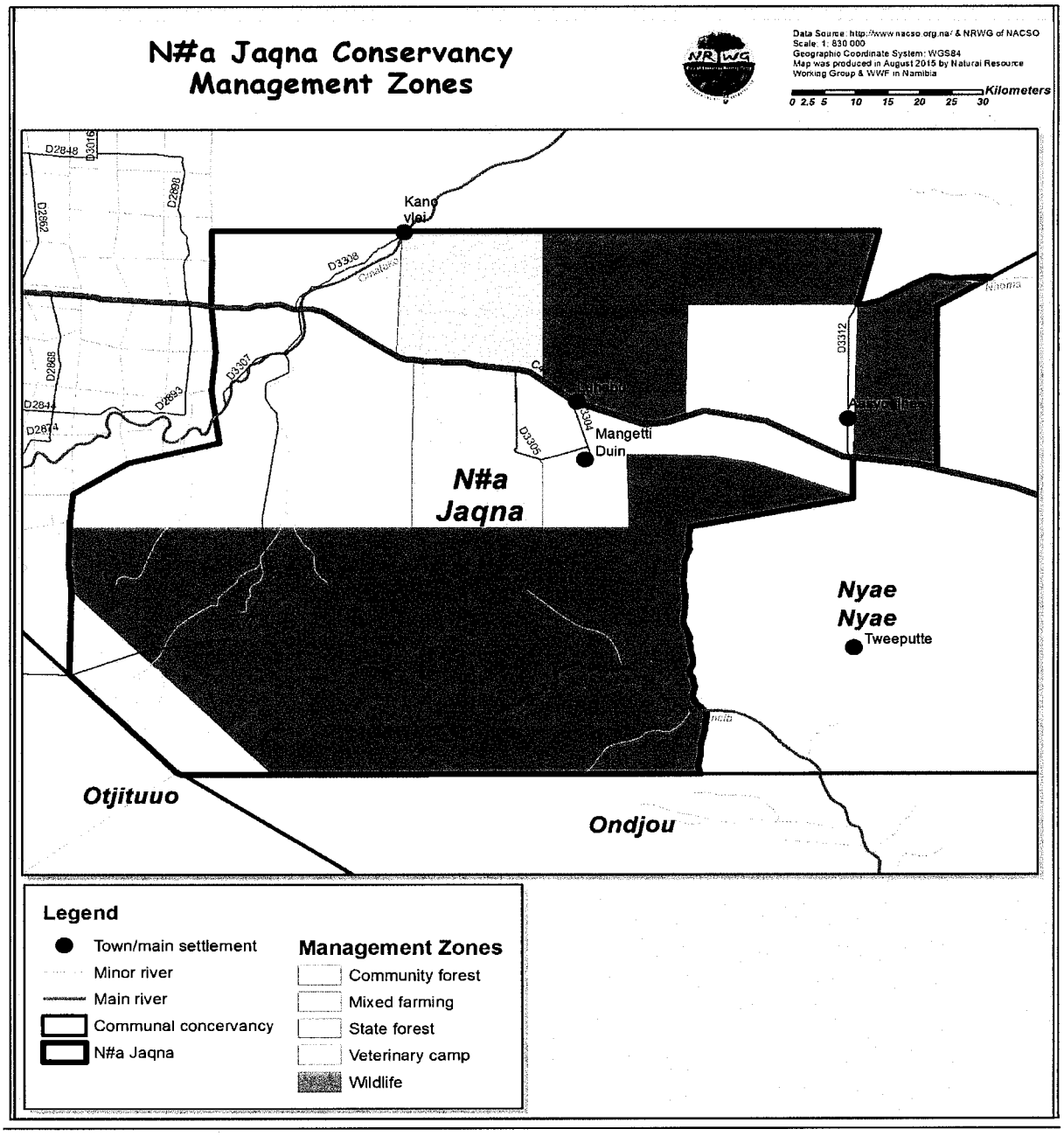
Signature:

Name: **Peter Thormahlen** Title: **Mr**

ATTACHMENT – 1 - Wildlife Water Point Development Schedule

1 **SCHEDULE 4**

Pledged activities and development;



2 **SCHEDULE 4**

Pledged activities and development;

Thormahlen & Cochran shall carry out all the items as stated in the Proposal to Na Jaqna for the first phase of the first three (3) years of the contract and attached as part of this agreement.

1. **TROPHY HUNTING CAMP**

T&C Safaris will build a Trophy Hunting Camp in N#a Jagna conservancy to Operate from. This camp will be built after an intensive study of the concession area keeping in mind water availability, impact on the concession, accessibility to hunting camp, distance from conservancy office etc. As well as recommendations from the N#a Jagna conservancy committee.

The Trophy Hunting Camp's permanent Structures will become the property of the Conservancy after the 3 year period expired.

2. **WILDLIFE WATER POINTS**

Please see Attached Map of N#a Jagna Conservancy.

The Wildlife Area of the concession was divided in three Zones:

- Block A
- Block B
- Block C

The Tender period is three years. Although it is understandable why an initial 3 year period is granted by the MET and WWF, it puts a lot of challenges in the road for a proper development program. The period is just too short for an operator to invest capital and to recover it before the tender period expires. On the other hand if the operator takes his chance and develops the conservancy as it should be developed, then I assume that his lease will be extended giving the opportunity to get the capital investment back over time. And hopefully the trophy quota will be raised due to more elephant in the concession which allows for more income and profits allowing capital investment to be recovered.

However given the limitations T&C Safaris proposes the following development plan:

BLOCK A

PHASE 1

Year One of Tender - 2016

Development of Block A would take part first as there are boreholes already in this block, but they are not in working order. It is also the block that borders Nyae Nyae conservancy which gives us the biggest opportunity to attract elephant into N#a Jagna, and to get them to become resident over time.

- Four existing Boreholes marked **+1, +2, +3, +4** on the Map in Block A will be cleaned out and Solar pumps installed with a watering hole. Two holes on the eastern border of N#a Jagna**(+1, +2)** bordering Nyae Nyae, and two boreholes in the western side of Block A **(+3, +4).** We budget on N$50,000 per solar pump and panels if the boreholes still have water and just need to be repaired and a solar pump and watering hole installed. If boreholes are dry we will still invest the N$200,000 for the year by drilling waterholes close to the old ones and installing solar pumps. **Reason being that + waterholes are located in river beds which are natural feeding areas for migrating elephant bulls. So by installing waterholes here enlarges the chance for migrating elephant bulls to smell the water while feeding in the riverine area so that they can discover the watering holes, use them and get used to them being permanent.**
- **Hence a Total of N$200,000 for 2016 will be invested**

PHASE 2

Year Two of Tender – 2017

- During this Phase Two strategic waterholes will be drilled in Block A. Depending on where the most elephant activity is the two holes will be drilled and solar pumps and watering holes installed. Our budget is N$125,000 per waterhole. Possibilities are Numbers **1, 2, or 3** on the map. **Reason being that numbers 1 & 2 is river beds which is natural feeding areas for migrating elephant bulls. So by installing waterholes here enlarges the chance for migrating elephant bulls to smell the water while feeding in the riverine area so that they can discover the watering holes, use them and get used to them being permanent.**
- **Hence a Total of N$250,000 for 2017 will be invested**

PHASE 3

Year Three of Tender – 2018

- During this Phase another Two strategic waterholes will be drilled in Block A. Depending on where the most elephant activity is the two holes will be drilled and solar pumps and watering holes

installed. Our budget is N$125,000 per waterhole. Possibilities are Numbers **4, 5, or 6** on the map. Number 5 waterhole is once again a riverine area which enhances the chance of elephant to bump into the waterhole. However now we go one step further and install watering holes **4,** and **6** in a "dead" zone where there may never have been even temporary water due to the Kalahari sand. With watering holes **1, 2, 5,** and **+ 3,** and **+ 4** having permanent all year water elephant will start wondering into this previously "dead "zone and back to the watering holes they know –numbers **1, 2, 5**, and **+ 3**, and **+ 4** to drink. Eventually they will discover watering **holes 6**, and **4** and the whole block will start to be utilized by migrating elephant which will over time turn into resident elephant.

- **Hence a Total of N$250,000 for 2017 will be invested**
- We will **drill Boreholes** and **install Solar Pumps** with watering holes – please see Development & Management plan outlay.

- **Transportation** is very important for the community due to the remoteness of the conservancy in the Bushmanland. However Wildlife Water Points is also a very high priority! Thormahlen & Cochran Safaris undertakes to let the N#a Jagna conservancy choose between either the Drilling of boreholes for Wildlife Water points, or a Vehicle in one of the three years. It is a difficult choice because the community may need a vehicle to transport community members, but on the other hand the only way we can develop the trophy hunting concession is by installing wildlife water points to attract elephant and other game into the conservancy.

- However, in the event that MET decides to enlarge the trophy quota, or if a Problem Elephant comes up and we sell it to a hunter, we undertake into buying of **a vehicle** for the conservancy. In the event of **a Problem elephant** we undertake to buy the vehicle in that year with the money made from hunting the bull with a foreign hunter, while we still proceed with the Wildlife Water Point Development & Management Plan. We do not encourage the declaring of a problem elephant just for the sake to buy a vehicle for the community! In the event that an elephant becomes a problem we undertake to use the funds made from the selling of that specific bull to buy a community vehicle.

- If there is a need for **a Satellite Dish & Television**, we undertake to buy a television with Satellite TV for the community hall as recreation, if a Community Hall does exist. If there is no **Nampower** we will also install **a Solar Power system with Batteries** for the community.

- If a **Community Hall** does not exist T&C Safaris undertakes to liaise with the N#a Jagna community into the building of a Community Hall if we are the successful bidder and we get another 2 years extension on the lease, so that we have a Five Year Contract..

- We will **Train and Sponsor the Training** of the members of the community as specified.

- In the event that the community needs **Salt Blocks** for their Cattle & Goats T&C Safaris will buy one ton of Salt Blocks per year for the community cattle.

- Training of the appointed Tracker to become **a Hunting Guide** in Year 3 (hence in October of the second year he will be sent to the hunting academy) of the Contract by sending him to the Volker Gruellmann Hunting Academy. The reason for sending him to the hunting academy in year 3 is for the member to gain hunting experience – on elephant, as well as baiting and hunting of leopard. It will be fruitless to send the member to the hunting academy if he has no trophy hunting experience. T&C Safaris undertakes to utilize the community member Hunting Guide so that he gain experience to become a master Hunting Guide and eventually a PH. With enough experience and if the potential exists the member could eventually qualify as a Big Game PH.

- When the N#a Jagna appointed Tracker qualifies T&C Safaris will appoint another **Tracker** in the community so that a Total of Six community members are permanently employed from year 3 onwards

- **Trophy Hunting Camp** will be built to conduct hunts from. Camp will consist of One Guest tent with en-suite bathroom, one Dining Tent / Lapa, one Kitchen tent, One Manageress / PH tent (tent will be divided in half to accommodate separate rooms), one PH /manageress Bathroom, and Five Staff Tents. A Skinning Area & Salt Room will be built for trophy skins. In the event that the Trophy Hunting Quota is enlarged a Second Guest Tent will be erected. The permanent fixed structures in the trophy hunting camp will become the property of the N#a Jagna community after the 3 year contract expires. In the event that our lease is extended we will negotiate with the community to Pay Rent to the community.

- **Donating of school supplies**. Our foreign hunting clients bring school supplies on a regular basis to Namibia – pencils, rubbers, etc.

3 SCHEDULE 5A

Envisaged Employment and Salaries:

Type of Local Staff To Be Employed	Estimated Number To Be Employed	Estimated Duration of Employment (please specify the number of days.)	Estimated Salary per Time of Employ (days)
Camp Staff- Trainee Chef/Manager-Female	1	365 days/12 months	N$65.75 p day/N$2000 p month
Skinner-Male	1	365 days/12 months	N$65.75 p day/N$2000 p month
Tracker-Male	1	365 days/12 months	N$65.75 p day/N$2000 p month
Other 1. Camp Attendant-Male	1	365 days/12 months	N$65.75 p day/N$2000 p month
2. Camp Lady -Female	1	365 days/12 months	N$65.75 p day/N$2000 p month
3.			

4 THE OPERATOR SHALL PROIVIDE FOOD TO ALL THE STAFF DURING THE PERIOD WHEN THEY ARE ON DUTY

5 SCHEDULE 5B

Types of training by operator:

Number of Local People to be Trained	Types of Training To Be Provided	Estimated Length of Training	Proposed Training Site	Commencement of training
1	Chef/Manager training	12 months (see below)	Windhoek Politec and in camp	Feb /March 2016
1	Tracker	See below		March 2016
1	Skinner	See below		March 2016
1	Camp Attendant	12 months	In house training	March 2016
1	Camp Lady	12 months	In house training	March 2016

6 **SCHEDULE 6**

7 **DOMICILIUM CITANDI ET EXECUTANDI**

The Conservancy: .....:

.....

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The operator: .....

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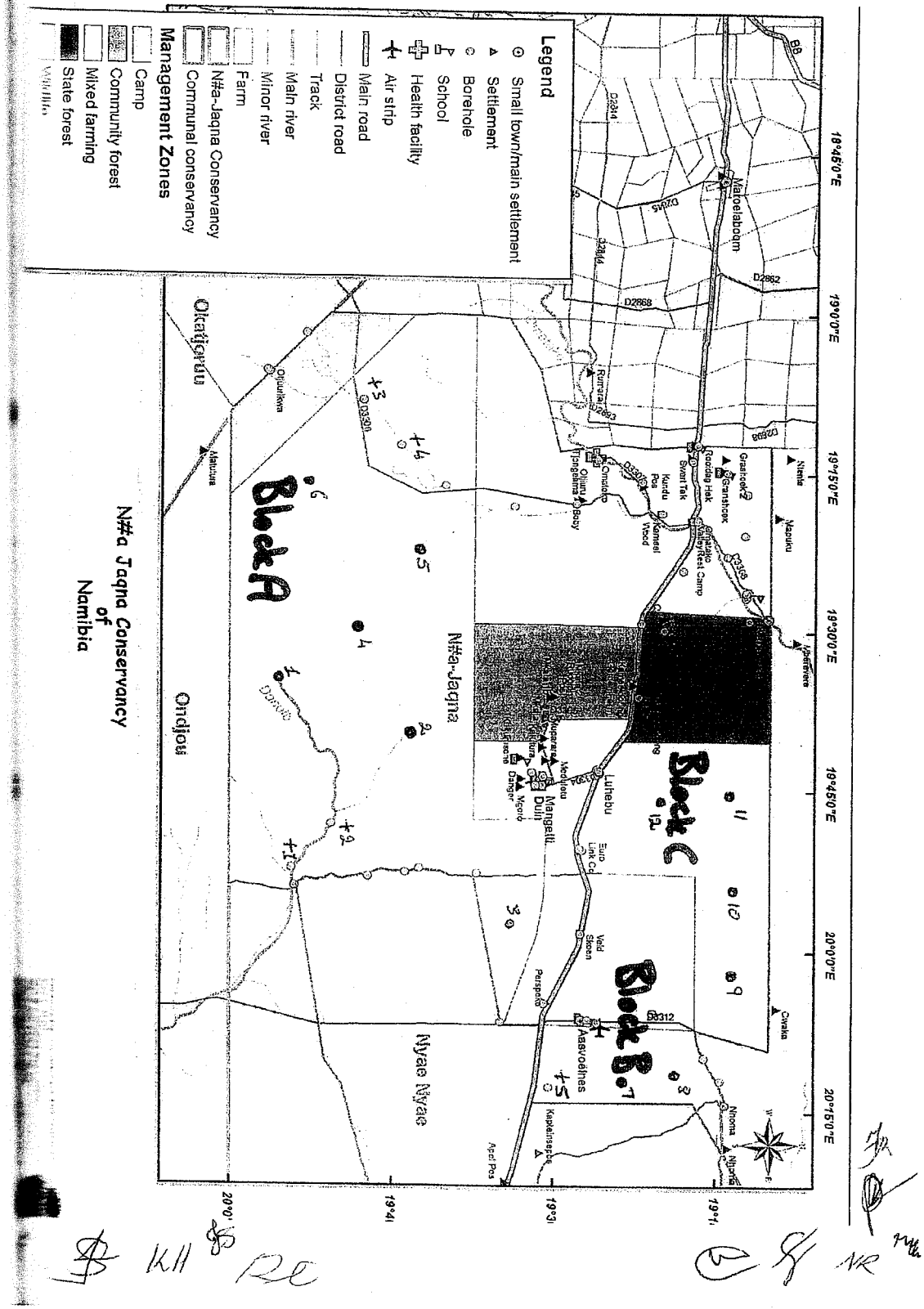
Legend
Small town/main settlement
Settlement
Borehole
School
Health facility
Air strip
Main road
District road
Track
Main river
Minor river
Farm
N#a-Jaqna Conservancy
Communal conservancy
Management Zones
Camp
Community forest
Mixed farming
State forest
N#a Jaqna Conservancy
of
Namibia
Block A
Block C
Block B
N#a-Jaqna
Nyae Nyae
Otjozondjou
Otjiwarongo
Maroelaboom
Grootoek
Klein Otjisemba
Kamsel Wood
Mangetti Dune
Luiperdrivier
Luhebu
Aasvoëlnes
Nhoma
Kapdeinsepos
Otjiwarongo
Okonjima
Omatako
Otjiwarongo
Otjiwarongo
Otjiwarongo

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Johnson	David	Gary	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Spicewood	Texas	78669	Travis	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. (b) (6)
...r with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ...nd I certify that the information submitted in this application for a permit is complete and accurate to the ... 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): 01-19-2018

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: NA (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: 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). NA

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, Otimbojo/Uhungu, Africa
   b. Date wildlife was hunted: September 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): 4 Elephant feet mounted as bar stools, tanned skin panels as leather, tanned face panel, tanned trunk, 2 tanned ears, tail as a flyswatter, 2 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]:
   Reisec Taxidermy
   Plot 43, Brakwater, Windhoek, ~~Namibia~~ Africa Namibia 9000

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: Reisec Taxidermy
   Name: Address: Sven Baard
   Address: Plot 43, Brakwater
   City: Windhoek
   State/Province:
   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:_____ 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, trade, barter, donation, or exchange that is reasonably likely to result in economic gain). I understand that I may only import two leopard trophies in one calendar year. I understand that I may not import more than two trophies in one calendar year. In addition, I understand that raw ivory may not be re-exported.

(b) (6) [redacted]

Applicant's signature _____ Date: 01-18-2018

Be aware that this activity may require permits or other 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.

David Gary Johnson
(b) (6)
Spicewood, Texas 78669
(b) (6)

RE: Namibia Africa Elephant Hunt September 19, 2017

Nick Nolte Hunting was contacted by the Namibia Ministry Of Environment and Tourism on or about September 17, 2017 to help in the removal of a problem/rogue bull elephant in the Otjimbojo/Uhungu (see attached Permit To Hunt For Trophies) area of Namibia, Africa. The Namibia Ministry Of Environment and Tourism stated that the Elephant was responsible for the deaths of two people and destroying approximately 20 huts in a village. The Namibia Ministry Of Environment and Tourism was seeking a hunter to pay to hunt the Elephant and the funds they were seeking would go to help the victims and their family's. The Namibia Ministry Of Environment and Tourism stated that if no paying hunter could be found the Elephant would be killed within 2-3 days time. The meat from the Elephant would go to the people of the village once it was dead.

(b) (6)

David Johnson

1-23-2017

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.:	174849
VALID FROM:	19/09/2017
VALID TO:	30/09/2017

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: David Gary Johnson

Residential Address:

Country: U.S.A

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

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell s	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
*	MET to identify the animal.	
*	MET to be present during hunt	
*	Not more than 5 in group	

on the following farms / hunting concessions: Otjimboja / Uhungu

Guided by (name of guides): Nick Nolte

Cashier receipt No: 21603591

Issued on: 15/09/2017

Amount received: N$

MINISTRY OF ENVIRONMENT & TOURISM
Elvis Murkel E-Murkel
ISSUING OFFICER (NAME & SIGNATURE)
UNDER THE AUTHORITY OF THE MINISTER, POHAMBA SHIPENGA PTERMS OF SECTION [illegible] OF THE NATURE CONSERVATION ORDINANCE, 1975 (ORDINANCE NO. 4 OF 1975) AS AMENDED.

Official MET date stamp

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

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		Professional hunter Master hunting guide Hunting guide
										Name	No			
21/9/17	ELEPHANT							0	MALE	OTJIMBOYO CONS.			(b) (6)	

*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.

Harlow, Caroline <caroline_harlow@fws.gov>

[EXTERNAL] Fwd: FWS Ref# PRT74826C, Namibia Elephant

1 message

David Johnson <(b) (6) Fri, Oct 5, 2018 at 11:15 AM
To: Caroline_harlow@fws.gov
Cc: Cindi Rulon <Cindi.Rulon@procargousa.com> (b) (6)

>

Subject: FWS Ref# PRT74826C, Namibia Elephant

Ms. Harlow:

Cindi Rulon with Pro Cargo USA requested that I email you directly my attached letter amending my CITES Application. If you have any questions please email or call me at (b) (6)

Thank you for your time and consideration.

David Johnson

2 attachments

Elephant Hunt 91917.pdf
49K

ATT00001
1K

David Gary Johnson
(b) (6)
Spicewood, Texas 78669
(b) (6)

October 4, 2018

RE: Namibia Africa Elephant Hunt September 19, 2017 (FWS Ref #PRT74826C

Paragraph 9.a.:

Following information provided by Namibia Ministry of Environment Elephant Study of 2017:

“Since 1975, elephant population has increased an average of 4.5% per year. In 1975 Elephant population was 7500. In 2017 Elephant population was over 22,700. It is estimated that sustainable population is a maximum of 22,000.” Therefore, reduction in Elephant population is necessary to prevent overpopulation and habitat destruction. In my case, the removal of this Elephant was necessary to protect the Villagers since this Elephant had already killed 2 people.

Paragraph 9.b.
I traveled to Namibia, Africa September 15, 2017 to hunt Leopard and plains game Nick Nolte Hunting Safaris (NNHS) for 14 days. I had no plans to hunt Elephant. When hunting in second and third world Countries many people benefit from the American dollars we bring into the economy. They have no social welfare systems and must subsist off the land and from what ever work they can find or products they can make a sell to tourist. When hunter’s are present not only do we inject American Dollars into the economy but, the majority of the meat from the animals harvested feeds the many workers supporting the Safari operations and area villagers when hunting government concessions.

Nick Nolte Hunting Safaris (NNHS) was contacted by the Namibia Ministry Of Environment and Tourism on or about September 17, 2017 to help in the removal of a problem/rogue bull Elephant in the Otjimbojo/Uhungu (see attached Permit To Hunt For Trophies) area of Namibia, Africa. The area where the Elephant lived was in a Park where there are several Tourist lodges. The Tourism Ministry had recently made the Lodges require their guest not feed the Elephants people food any longer because the Tourism Ministry had determined the Elephants were becoming to dependent on the people food (ie: oranges, lettuce, apples) and not feeding on their native/natural forge enough. The lodges have man made barriers around them that keep the Elephants and other native animals from just walking into the lodge grounds.

It was to late the Elephants had become used to eating the people food so they started looking for other sources of people food in native villages located in the Park. Even though the villages are located many miles from the river bottoms where the Elephants mostly live the Elephants were waiting for the cool night air to set in then leaving the river and walking to the villages. They were following the scent of the people food in the air. The huts the villagers live in are constructed with what ever sticks, logs, rock,

cardboard and metal panels they can find. When the Elephants arrived in the village in the middle of the night they started crushing the huts, with sleeping people inside, trying to get the people food.

The Namibia Ministry Of Environment and Tourism stated that the bull Elephant was responsible for the deaths of two people and destroying approximately 20 huts in the village. Two days prior to our arrival to hunt the Elephant the villagers had moved out of their village to a mountain top several miles away. They refused to walk to their village when they needed something and the Park management was having to drive the villagers from the mountain to their village and back to the mountain.

The Namibia Ministry Of Environment and Tourism was seeking a hunter to pay to hunt the Elephant and the funds they were seeking ($15,000.00 USD) would go to compensate the family's whose loved ones had been crushed to death and other victims and their family's rebuild and refurbish their huts. The Namibia Ministry Of Environment and Tourism stated that if no paying hunter could be found the Elephant would be killed within 2-3 days time. The meat from the Elephant would go to the people of the village once it was dead. Within 1 1/2 hours of having the Elephant on the ground the villagers started showing up on their Donkey Carts, on foot and in Park vehicles for their share of the Elephant meat. They all wanted to shake my hand and thank me for helping them with the Elephant, feed their family's and making it safe for them to move back to their village.

Leopard hunt daily fees total:	$10,465.00
Leopard License:	$115.00
Leopard Tag:	$1150.00
Plains Game Permit:	$115.00
Bait game charges:	$2070.00
Transportation:	$850.00
Elephant:	$15,000.00
Elephant Taxidermy:	$8860.00
Tips to 2 trackers, 3 house helpers, 3 skinners, 1 driver, 1Professional Hunter:	$3750.00
Total USD Spent In Namibia Economy:	$42,375.00

Paragraph 9.c.
The Professional Hunter I hunted with has orchards in the northern part of Namibia that he runs year round. He told me his average worker is paid $120.00 USD per month, is provided a hut without running water or electricity and all the fruit they can eat on site while working. I tipped the head tracker $350.00 and the learner tracker $150.00. When they are working at the hunting lodge they also get 3 meals a day, fresh water, clothing, and a hut with electricity, running water and inside restroom.

Thank you
David Johnson

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

Federal Fish and Wildlife Permit Application Form

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

FEB 7 2018

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Coker	Howard	C.	N/A

(b) (6) [redacted]

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	N/A

2. Tax identification no	3. Description of business, agency, Tribe, or institution
N/A	N/A

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
N/A	N/A	N/A	N/A

5. Principal officer title	6. Primary contact name
N/A	N/A

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
N/A	N/A	N/A	N/A

C. All applicants complete address information

(b) (6) [redacted] #, Suite #, or Room #, no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Jacksonville	FL	32207-2119	Duval	USA

(b) (6) [redacted] 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
Jacksonville	FL	32201	Duval	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA10501C-0 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

(Do not submit photocopied or stamped signatures) Date of signature (mm/dd/yyyy): 01/30/2018

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 MA10501C-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. N/A
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal. ATTACHED

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: (b) (6) Date: 01/30/2018

   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: N/A Date: N/A

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): James L. Boone

(b) (6) [redacted]

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

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

Renewal Application Addendum
Permittee: Howard C. Coker
Permit #: MA10501C-0

In response to the requirements of Section E, 3b, a successful elephant hunt was conducted and the trophy is still being prepped by the Namibian taxidermist. They have indicated the shipment will not be ready prior to the expiration date of the existing permit.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA10501C-0

Effective: 03/13/2017 Expires: 03/12/2018

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

Scr!

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

HOWARD C. COKER
(b) (6)
JACKSONVILLE, FL 32207-2119
U.S.A.

Original, Unused Permit Returned

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. Trophy must have been taken during the 2017 hunting season.

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. Valid for use by permittee named above.

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

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. Specimen may not be sold or transferred for any financial remuneration.

I. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II expot permit issued by the Management Authority of Nambia.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA10501C-0

Effective: 03/13/2017 Expires: 03/12/2018

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

Sec'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

HOWARD C. COKER
(b) (6) [redacted]
JACKSONVILLE, FL 32207-2119
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. Trophy must have been taken during the 2017 hunting season.

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. Valid for use by permittee named above.

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

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. Specimen may not be sold or transferred for any financial remuneration.

I. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II expot permit issued by the Management Authority of Nambia.

Barry , Anna <anna_barry@fws.gov>

Howard Coker PRT #10501C

1 message

Barry , Anna <anna_barry@fws.gov> Thu, May 17, 2018 at 10:40 AM
To (b) (6)

Dear Mr. Jim Boone,

In response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service is revising its procedure for assessing applications to import certain hunted species like African elephants. We are withdrawing our countrywide enhancement findings for a range of species across several countries. In their place, the Service intends to make findings for trophy imports on an application- by-application basis. Please be aware that we continue to seek additional information directly from the relevant foreign Government Authorities to support our permit findings, therefore, applications are still under review.

Because each application now requires an individual finding under the Endangered Species Act, all application both new and ones submitted for renewal, cannot be finalized until this review process has been finalized.

Sincerely

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT You may have noticed that our application forms expired 5/31/2017 . The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

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

Federal Fish and Wildlife Permit Application Form

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

RCVD OCT 18 2016

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

Type of Activity:
Import of Sport-hunted Trophies 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
COKER	HOWARD	C	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		N/A

5.a. Telephone number	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)
N/A	N/A

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
N/A	N/A

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
N/A	N/A	N/A	N/A

5. Principal officer title	6. Primary contact name
N/A	N/A

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
N/A	N/A	N/A	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
JACKSONVILLE	FL	32209-2119	DUVAL	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
JACKSONVILLE	FL	32201	DUVAL	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I under(b) (6) me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible[redacted]res) Date of signature (mm/dd/yyyy) 8/30/16

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: 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; Katima Mulilo District; Bwabwata National Park East; near the village of Kongola; GPS coordinates: S17°44.408' E023°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 Ndumo Safaris Ltd.
Name: Address: Karl Stumpf | Frederick Bezuidenhout
Address: P.O. Box 1667
City:
State/Province:
Country, Postal Code: Ngweze, 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 ivo[redacted]s, cannot be re-exported.

Applicant's signature: (b) (6) [redacted] Date: 8/30/16

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).

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
(b) (6) [redacted]

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

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

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.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA10501C-0

Effective: 03/13/2017 Expires: 03/12/2018

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

Sec'

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

HOWARD C. COKER
(b) (6) [redacted]
JACKSONVILLE, FL 32207-2119
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. Trophy must have been taken during the 2017 hunting season.

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. Valid for use by permittee named above.

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

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. Specimen may not be sold or transferred for any financial remuneration.

I. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II expot permit issued by the Management Authority of Nambia.

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

Federal Fish and Wildlife Permit Application Form

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

FEB 7 2018

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Coker	Howard	C.	N/A

(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)
N/A	N/A

2. Tax identification no	3. Description of business, agency, Tribe, or institution
N/A	N/A

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
N/A	N/A	N/A	N/A

5. Principal officer title	6. Primary contact name
N/A	N/A

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
N/A	N/A	N/A	N/A

C. All applicants complete address information

(b) (6) #, Suite #, or Room #, no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Jacksonville	FL	32207-2119	Duval	USA

(b) (6) 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
Jacksonville	FL	32201	Duval	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA10501C-0 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

(Do not submit photocopied or stamped signatures) Date of signature (mm/dd/yyyy): 01/30/2018

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 MA10501C-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. N/A
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal. ATTACHED

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: (b) (6) Date: 01/30/2018

   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: N/A Date: N/A

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): James L. Boone
(b) (6) [redacted]

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

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

Renewal Application Addendum
Permittee: Howard C. Coker
Permit #: MA10501C-0

In response to the requirements of Section E, 3b, a successful elephant hunt was conducted and the trophy is still being prepped by the Namibian taxidermist. They have indicated the shipment will not be ready prior to the expiration date of the existing permit.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA10501C-0

Effective: 03/13/2017 Expires: 03/12/2018

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

Scr!

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

HOWARD C. COKER
(b) (6) [redacted]
JACKSONVILLE, FL 32207-2119
U.S.A.

Original, Unused Permit Returned

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. Trophy must have been taken during the 2017 hunting season.

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. Valid for use by permittee named above.

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

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. Specimen may not be sold or transferred for any financial remuneration.

I. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II expot permit issued by the Management Authority of Nambia.

Barry, Anna <anna_barry@fws.gov>

Howard Coker PRT #10501C

Bar[redacted]**gov>** Thu, Feb 7, 2019 at 4:57 PM
To: (b) (6) [redacted]

Dear Mr. Boone,

The application is still under review.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

[Quoted text hidden]

Barry, Anna <anna_barry@fws.gov>

Howard Coker PRT #10501C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Feb 19, 2019 at 1:25 PM
To: Jim Boone <(b) (6)

All current applications for the import of elephant trophies are under review.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Tue, Feb 19, 2019 at 1:21 PM Jim Boone <(b) (6) wrote:

> Great news. Are you aware of any that have passed and permits issued?
>
> Best Regards,
>
> Jim Boone
> (b) (6)
> (b) (6)
> (b) (6)

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 priviledged, 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 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.

From: "Barry, Anna" <anna_barry@fws.gov>
To: "Jim Boone" <(b) (6)
Sent: Tuesday, February 19, 2019 12:58:32 PM
Subject: Howard Coker PRT #10501C

Dear Mr. Boone,

All elephant trophy applications are currently under review.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Thu, Feb 7, 2019 at 5:20 PM Red Bluff Lodge <(b) (6) wrote:

> Thank you, Ms. Anna. Are you aware of any elephant permits being issued?
>
> Best Regards,
>
> Jim Boone
> (b) (6)

Barry, Anna <anna_barry@fws.gov>

Howard Coker PRT #10501C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Feb 19, 2019 at 12:58 PM
To: Red Bluff Lodge (b) (6)

Dear Mr. Boone,

All elephant trophy applications are currently under review.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Thu, Feb 7, 2019 at 5:20 PM Red Bluff Lodge (b) (6) wrote:

> Thank you, Ms. Anna. Are you aware of any elephant permits being issued?
>
> Best Regards,
>
> Jim Boone
>
> (b) (6)

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 priviledged, 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 Feb 7, 2019, at 4:57 PM, Barry, Anna <anna_barry@fws.gov> wrote:

Dear Mr. Boone,

The application is still under review.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

---------- Forwarded message ---------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Thu, May 17, 2018 at 10:40 AM
Subject: Howard Coker PRT #10501C
To: < (b) (6) [redacted]

Dear Mr. Jim Boone,

In response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service is revising its procedure for assessing applications to import certain hunted species like African elephants. We are withdrawing our countrywide enhancement findings for a range of species across several countries. In their place, the Service intends to make findings for trophy imports on an application- by-application basis. Please be aware that we continue to seek additional information directly from the relevant foreign Government Authorities to support our permit findings, therefore, applications are still under review.

Because each application now requires an individual finding under the Endangered Species Act, all application both new and ones submitted for renewal, cannot be finalized until this review process has been finalized.

Sincerely

Anna Barry

Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT *You may have noticed that our* ***application forms expired 5/31/2017****. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

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

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

Federal Fish and Wildlife Permit Application Form

FEB 7 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.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
DE NATALE	Ralph	W	

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

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

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Woodbridge	CT	06525	New Haven	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 01/28/2018

Signature (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 SOUTHERN WHITE RHINOCEROS

Below is the details of Save Valley etc
Address is P.O. Box CH381 Chispite Harare
Area hunted Save Valley Conservancy
Area:Nyika Region: Masvingo
Ranch Matendere and Mapari
Nearest City Masvingo
Co ordinates 20.516985 32.096167

ies that you did not use, please **return the unused original**
ecause you have taken a trophy, but were unable to import it
ewal form (3-200-52;
nber/index.html) and return your original permit with that

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:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: SAVE VALLEY CONSERVANCY, P.O. BOX CH381 CHISPITE HARARE, ZIMBABWE AREA: NYIKA REGION: MASVINGO RANCH: MATENDERE AND MAPARI NEAREST CITY: MASVINGO, COORDINATES 20.516985 & 32.096167
   b. Date wildlife is to be hunted: 06/25/2018 – 07/14/2018
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).
      SKIN, SKULL, TASKS, 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:
   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: GAVIN RORKE PROFESSIONAL HUNTER LICENSE 318
Business Name: SAFARI SERVICES AFRICA LLC
Address: 6 MILLAR ROAD,
Address:
City: BORROWDALE HARARE
State/Province:
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: _____ 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, ca

Applicant's signature: (b) (6) Date: 01/28/2018

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).

NEW York, 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):

RALPH W. DE NATALE (b) (6) [redacted]

email: (b) (6) [redacted]

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

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

DEPARTMENT OF THE INTERIOR Mail

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry Prt # 75669C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Fri, Oct 4, 2019 at 2:03 PM
To: (b) (6)

Ralph

On **02/07/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 75669C**. At the me of the applic aon' s submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] RE: Elephant Withdrawal Inquiry Prt # 75669C

1 message

Ralph Denatale <(b) (6) > Fri, Oct 4, 2019 at 3:45 PM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>

I did hunt for elephant but was not successful.

From: MacDonald, Tim [mailto:tim_macdonald@fws.gov]
Sent: Friday, October 4, 2019 2:04 PM
To: Ralph Denatale
Subject: Elephant Withdrawal Inquiry Prt # 75669C

Ralph

On **02/07/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 75669C**. At the me of the applic aon' s submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist

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

RCVD FEB 9 2018

ALL U.S. CITES ARE TO BE MAILED TO:

D&L CHB, LLC

1500 MIDWAY COURT,

STE W201

ELK GROVE VILLAGE, IL 60007

PLEASE NOTE THAT SECTION 9 DOES ASK WHERE TO MAIL AND WE DO FILL IN TO MAIL TO D&L

THANK YOU!

RCVD FEB 9 2018

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

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

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:
Import of Sport-hunted Trophies 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	1 b. First name	1 c. Middle name or initial	1 d. Suffix
Pahlau	Richard		

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

6 a. Telephone number	6 b. Alternate telephone number	6 c. Fax number	6 d. E-mail address
(b) (6)		847-690-0699	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. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1 b. City	1 c. State	1 d. Zip code/Postal code	1 e. County/Province	1 f. Country
Massillon	OH	44646	Stark	U.S.A.

2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Laura Durgin — 1/31/2018

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES 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: N/A (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: 2 (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: 1/ Divunda Natl Park, Namibia 2/ Bwabwata West, Katima Mal. IV
   b. Date wildlife was hunted:
      1/ 06/10/2017
      2/ 06/11/2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): 4 TUSKS, SKIN, 2 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 document]:

Trophaendienst
Box 21068
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: J.H. Pienaar
Business Name:
Address: Private Bag 2105
Address:
City: Gobabis
State/Province:
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: Laura Durgin 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 (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.

#9032

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:

- [x] Individual
- [ ] Partnership
- [ ] Corporation
- [ ] Sole Proprietorship
- [ ] Limited Liability Company

SS# (b) (6) [redacted]

KNOW ALL MEN BY THESE PRESENTS: That, ✓ Richard L. Pahlau (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identity) doing business as a ✓ INDIVIDUAL (Individual, partnership, corporation, sole proprietorship) under the laws of the State of ✓ Ohio, residing or having a principal place of business at ✓ (b) (6) [redacted], Massillon, OH 44646 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, 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 (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 ✓ Richard L. Pahlau

caused these presents to be sealed and signed: (Signature) (b) (6) [redacted]

(Capacity) ✓ N/A Date: 03/23/2017

Witness: (if required) N/A

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

APPERSON PRINT MANAGEMENT SERVICES • NCBFAA-3 • WHSE. NO. 03540

(b) (6)
(b) (6)

Barry, Anna <anna_barry@fws.gov>

D & L Customs Brokers

1 message

Villavicencio, Jorge <jorge_villavicencio@fws.gov> Wed, Aug 1, 2018 at 10:33 AM
To: Ailteas Braxton <ailteas_braxton@fws.gov>, Luis Rivera <luis_rivera@fws.gov>, "MacDonald, Tim" <tim_macdonald@fws.gov>, Miguel Richardson/ARL/R9/FWS/DOI <Miguel_Richardson@fws.gov>, Rogelio Hubbard <rogelio_hubbard@fws.gov>, "Whitley, Stephanie" <stephanie_whitley@fws.gov>, "Williams, Robert" <robert_williams@fws.gov>, Caroline Harlow <caroline_harlow@fws.gov>, Kathleen Moore <kathleen_moore@fws.gov>, Anna Barry/ARL/R9/FWS/DOI <Anna_Barry@fws.gov>

Dear Team Mates:

D & L Customs House Brokers has moved and has a new address. There are several applications here that when the permit(s) is(are) issued must be mailed to D & L's new address. That new address is:

D&L CHB, LLC
2015 S. ARLINGTON HEIGHTS, SUITE 123
ARLINGTON HEIGHTS, IL 60005

The file numbers and person assigned the file(s) are:

98157C	AB
75906C	AB
80967C	MR
80975C	MR
11485C	MR
98158C	SDW
98120C	SDW
98119C	SDW
98118C	SDW
98117C	SDW
98115C	SDW
46993C	SDW
42537C	TM
80972C	RH
75883C	RW
75905C	RW
75904C	RW

A couple of these files show that they have been recently issued but not yet mailed.

Please make these changes to the application package that you are working on and add this e-mail to the administrative record of the file(s) assigned to you.

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 priviledged, 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.

RCVD FEB 12 2018

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

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

Federal Fish and Wildlife Permit Application Form

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

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Hadden	David	Alexander	

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

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			swhadd46@yahoo.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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Corpus Christi	TX	78414	Nueces	United States

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other [illegible] and I certify that the information submitted in this application for a permit is complete and accurate to the [illegible] statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

1-19-2018

[illegible]ermit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   - Panthera Pardus Pardus, African Leopard
   - Loxodonta Africana African Elephant
   b. Sex (if known).
   - Male - African Leopard
   - Male - African Elephant
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
   N/A
   b. Date wildlife is to be hunted:
   N/A
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
   N/A
3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

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

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

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

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
47 Goud St. Laboria
Polokwane, Limpopo Province, RSouth Africa 0704

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

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

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

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature [redacted] Date: 1-19-2018

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

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

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

N/A

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

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

N/A

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

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

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

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

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 28 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
DOUGLAS	LLOYD	W	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	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)
N/A	

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ALEDO	TX	76008	PARKER	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
ALEDO	TX	76008	PARKER	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA12428C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ap[illegible]***le 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the be[illegible]ny false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Si[illegible] (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy): 02/09/2018

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:_____(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:

   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: Namibia, Concession Area Baleyrwa, GPS Coorinates -18.2912270 23.6067500 21 September 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 x tusks, 4 x feet, skull, 2 x ears, 6 x panels, 2 x femur bones, trunk, tail, 2x eye panels, penis.

   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]:

   Trophaendienste CC, Plot 65/16, Kappsfarm, 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:	Trophaendienste CC; Louw Nel; Telephone +264 232 236
Address:	Plot 65/16
City:	Kappsfarm
State/Province:	PO Box 21068
Country, Postal Code:	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.

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.

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 into the United States, cannot be re-exported.

Applicant's signature (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).

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 ---------and---------
Lorna Hamblin (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 MAR 9 2018

March 8, 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: Elephant Import Permit

To Whom it Concerns,

My name William Chad Perry, shortly after I heard of the President of the United States signing a bill to legally import elephants from Zimbabwe I booked a hunt. I did harvest a mature elephant shortly before Christmas 2017. It was a very joyous and happy occasion for the village that the elephant was taken by and for myself.

Several hundred people from the village showed up when the elephant was being butchered. 141 families in the village benefited from the meat from the elephant.

There was a financial benefit from the cost of the hunt that was distributed to the people in the village as well.

Your consideration for this permit would be greatly appreciated.

Sincerely,

(b) (6)

William Chad Perry

RCVD MAR 9 2018

Form 3-200-19

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
PERRY	WILLIAM	CHAD	

2. Date of Birth (mm/dd/yyyy) | 3. Telephone Number | 4. Alternate Telephone Number | 5. E-mail address

(b) (6) [redacted]

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ANDOVER	KANSAS	67002	BUTLER	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b) (6) [redacted] / ATT: WILLIAM PERRY

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
WICHITA	KANSAS	67211	Butler	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.

Signatu (b) (6) [redacted] plied or stamped signatures) Date of signature (mm/dd/yyyy)

se 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.

(b) (6) [redacted]

WICHITA, KANSAS 67211

ATT: WILLIAM CHAD PERRY

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

WILLIAM CHAD PERRY

(b) (6) [redacted]

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

(No) Yes

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

4. 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).

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:

ZIMBABWE GPS - SE 182526
PROPERTY - MASIKILI VICTORIA FALLS

   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]:

COLLETTS WILDLIFE ARTISTRY
15 JOSIAH CHINAMANO ROAD
BELMONT, BULAWAYO +263 9 885868

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: RIANA LIGTHELM
Business Name: SAFARI TAXIDERMY
Address: 47 GOUD STREET
Address: LABORIA
City: POLOKWANE
State/Province:
Country, Postal Code: RSA, 0704

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: 2/28/18

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).**

PORT: DFW AIRPORT, TEXAS 75261

PHYSICAL: 1639 WEST 23, STE 105
PHONE: (972) 574-3254
FAX: (972) 574-4669

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:_____(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:

   b. Date wildlife is to be hunted:

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
21 DEC 2017
P. BAG 5926
VICTORIA FALLS

Specified officer's signature and date-stamp

Cert. № 120584

Name William Chad Perry

(b) (6) [redacted]

Address Andover Kansas

United States

Tusk serial number ZW 2017 25075

Tusk mass (kg) 13 kg

Tusk length (metric) 141 cm

Sex M

Authority 07919

(b) (6) [redacted]

Signature of holder

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.

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CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
21 DEC 2017
P. BAG 5928
VICTORIA FALLS

Specified officer's signature and date-stamp

Cert. No. 120585

Name William Chad Perry

(b) (6) [redacted]

Address Andover Kansas
United States

Tusk serial number	2w2017-250714
Tusk mass (kg)	13 Kg.
Tusk length (metric)	139 cm
Sex	M

Authority 07[illegible]

(b) (6) [redacted]

Signature of holder .....

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.

/2017-LOX

ELEPHANT

TROPHY EXPORT TAG

ZW 087/500/2017-LOX

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 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Bundrant	Ernest	Patton	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)	(925) 417 5270	(925) 417 0170	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	1.b. Doing business as (dba)
N/A	

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Peralta	NM	87042		USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Atty. In Fact For Ernest Bundrant — 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:_____(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:

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: Klaserie Private Nature Reserve, South Africa

   b. Date wildlife was hunted: August 4, 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, 2x Skin panels, 4x Feet, 2x Ears, Tail, Trunk, 2x Tusks (ZA/17/2656/16.30MP;ZA/17/2655/14.95MP)

   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 Street, 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 Street
City:	Laboria
State/Province:	Polokwane
Country, Postal Code:	RSA

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 Ernest P. Bundrant 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 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):

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

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.

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 66007

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 2 / 8 / 2017 Terminated 4 / 8 / 2017

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

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

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: H. SWANEPOEL

Business Address: P.O. BOX 382

GRAVELOTTE

Code: 0895

ID No: 7111 13 5216 081

PH Permit No: MTPA/PH/1899

Date: 5/8/2017 Signature:

CLIENT

Name: ERNEST P. BUNDRANT

Permanent Postal Address: [redacted]

PERALTA, NEW MEXICO Code:

Country: U.S.A. Tel/Fax: [redacted]

Passport No [redacted]

Email [redacted]

Date: 5/8/2017 Signature: Ernest P Bundrant

HUNTING OUTFITTER

Name: SANDY McDONALD

Business Address: FARM KAREEBOSCH

POLOKWANE Code: 0699

I.D. No: 6508305086080

Tel No: +27832279709 Fax No: N/A

HO Permit No: MTPA/HO/0803

Date: 5/8/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
KLASERIE PNR.	HOEDSPRUIT	C. ROWLES KPNR.	14154	4/8	ELEPHANT	K		1	TUSKS, SKIN, FEET, EARS, TAIL, TRUNK, SKULL

Address to which trophies are to be sent: AS ABOVE

Code: Country: U.S.A. Trophy Export Date (Estimate):

Conservation Levy

Total:

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: 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

Permit No: 14154

Mpumalanga
TOURISM AND PARKS AGENCY

PERMIT FOR THE HUNTING OF

(Issued in terms of the Provisions of the Nature Conservation Act 10 of 1998)

MPUMALANGA TOURISM & PARKS AGENCY
PROFESSIONAL HUNTING
Date Stamp
2017 -07- 27
PRIVATE BAG X 11338
NELSPRUIT 1200

★ [X] SPECIALLY PROTECTED GAME
★ [ ] PROTECTED GAME
★ [ ] ORDINARY GAME DURING A PERIOD WHICH IS *NOT AN OPEN SEASON*
★ [ ] PROTECTED WILD ANIMALS
★ [X] GAME IN A NATURE RESERVE

★ *Mark the square as indicated in the authorisation of the Chief Executive Officer.*

Full name ERNEST P BUNBRANT (# (b) (6)

and residential address of the holder of the permit (b) (6) PERALTA, NEW MEXICO, USA.

Name of the owner of the land to be hunted on COLIN ROWLES

(HO - SANDY MCDONALD

PARTICULARS OF THE HUNT

Name of farm or nature reserve and district in which it is situated	Species, number and sex of game which may be hunted	Species, number and sex of game hunted and the time and date on which it was hunted
KLASSIE PNR MACDSPRUIT	ONE (1) ELEPHANT BULL	

TO BE HUNTED IN ACCORDANCE WITH THE APNR HUNTING PROTOCOL AND APPROVED QUOTA

In terms of and subject to the provisions of the Nature Conservation Act 10 of 1998, the holder of the permit is hereby authorised to hunt the species, number and sex of the game referred to in the second column of the particulars of the hunt on the farm or nature reserve referred to in the first column thereof during the period of validity of the permit, subject to the conditions of the permit.

PERIOD OF VALIDITY OF THE PERMIT

The permit shall be valid for the period 02/08/ 20 17

to 14/08/ 20 17

VEEARTSNYPERMIT WORD OOK BENODIG:
VIR VERVOER VAN LEWENDE WILD EN ROU
VLEIS OF PRODUKTE.
VETERINARY PERMIT IS ALSO REQUIRED:
FOR TRANSPORT OF LIVE GAME AND RAW
MEAT OR PRODUCTS.

Number and date of the authorisation of the Chief Executive Officer .....

Permit/licence Fees:

Received R 5000-00 + R100 ADMIN FEE Receipt No E/7

Signature of the person authorised by the Chief Executive Officer to issue the permit. (b) (6)

TO BE FORWARDED TO:

WILDLIFE PROTECTION SERVICES
Private Bag X11338, Nelspruit, 1200 • Tel +27 (0)13 759 5300/1 • Fax +27 (0)13 759 5490

SEE CONDITIONS & REQUIREMENTS ON REVERSE SIDE

Printed by White River Printers 013 751 2478

CUSTOMS POWER OF ATTORNEY

and

Acknowledgment of Terms and Conditions of Service

Social Security number (b) (6) [redacted]

Date of birth (b) (6) [redacted]

Know all men by these presents: That, ERNEST PATTON BUNDRANT
(Full legal name of individual)

residing at (b) (6) [redacted] PERALTA NEW MEXICO 87042
(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, 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 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 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.

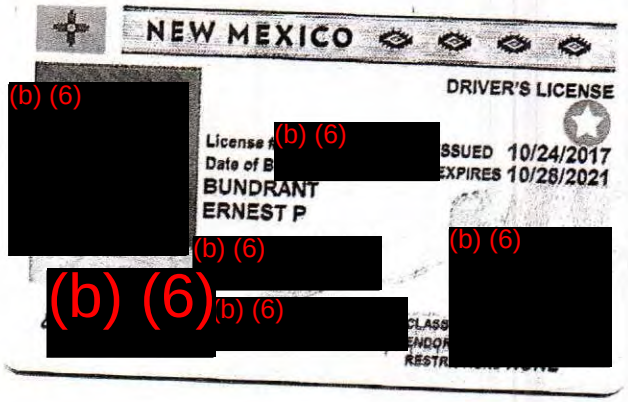
IN WITNESS WHEREOF, the said (Print full legal name) ERNEST PATTON BUNDRANT

has caused these presents to be sealed and signed: (Signature) (b) (6) [redacted]

(Capacity) _____ (Date) FEBRUARY 16 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)


NEW MEXICO
DRIVER'S LICENSE
(b) (6)
License
Date of B
BUNDRANT
ERNEST P
(b) (6)
ISSUED 10/24/2017
EXPIRES 10/28/2021
(b) (6)
(b) (6)
(b) (6)
(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 (b) (6)

Name: Dwight Miller

Date: 3/8/18

Form 3-200-20

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

Federal Fish and Wildlife Permit Application Form

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

MAR 2 3 2018

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

Type of Activity:

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Miloff	Dwight	Lee	

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

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Billings	Montana	59101	Yellowstone	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

(b) (6)

3/8/18

(No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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

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

---

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

   Same Address

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

   Dwight Miloff (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   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 (b) (6) _____ 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 km²
Range Area	81,228 km² (21%)
Protected Range	61 %
Information Quality Index (IQI)	0.86
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Poaching of elephants for ivory has escalated in the past ten years and has become a major problem in Zimbabwe. A worrying recent development has been the emergence of poisoning as a poaching technique. Just over 100 elephants were killed in a single cyanide poisoning incident in Hwange National Park in late 2013 (Muboko et al., 2014). The impact of poaching has been highest in the north of the country, particularly in the Sebungwe Region to the south of Lake Kariba, and the Lower Zambezi Region (Dunham et al., 2015c). Although elephant numbers have increased in Gonarezhou National Park, it too experienced an increase in poaching in 2015 (Dunham & van der Westhuizen, 2015).

Concern has been expressed about the impact of high numbers of elephants on vegetation and other biodiversity in Zimbabwe's protected areas. Despite the increase in poaching, this remains a problem in protected areas such as Hwange NP, where the provision of artificial water supplies has led to high elephant densities (ZPWMA, 2015).

Zimbabwe published a national elephant management plan covering the period 2015 to 2020 (ZPWMA, 2015).

In 2008, Zimbabwe undertook an approved one-off sale of 3,764 kg of ivory to Japan and China, at a price of USD $487,162 (Wijnstekers, 2011).

Zimbabwe's annual declared export quota of elephant trophies remains unchanged since 2007 at 1,000 (tusks as hunting trophies from 500 animals) (CITES, n.d.-b). In 2015, the US Fish and Wildlife Service removed its 'non-detriment' finding, thus banning the import of elephant trophies into the USA (USFWS, 2015a).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Zimbabwe is 82,630 ± 8,589 at the time of the last survey for each area. There may be an additional 1,635 to 1,805 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 78,839 km^2, which is 97% of the estimated known and possible elephant range. There remains an additional 3% of the estimated range for which no elephant population estimates are available.

There has been a decline of just over 10,000 elephants from surveyed populations since the AESR 2007 and an increase of about 1,000 in guesses, mostly from previously unsurveyed areas in North West Matabeleland. Although there have been large losses from the Sebungwe and Lower Zambezi populations, these have been partially compensated by increases in Gonarezhou and North West Matabeland.

The major populations of the Lower Zambezi Valley (including Mana Pools National Park), Sebungwe (including Matusadona and Chizarira National Parks), North-west Matabeleland (including Hwange and Zambezi National Parks) and the south-east Lowveld (including Gonarezhou NP) were surveyed in 2014 using **aerial sample counts** (including block counts in hilly areas) as part of the Great Elephant Census.

The estimate from the Lower Zambezi Valley in 2014 was 11,656 ± 2,259 (Dunham et al., 2015c). The previous comparable estimate was 19,297 ± 2,527 in 2001 (Mackie, 2002). The 2014 figure replaces an estimate from the AESR 2007 of 19,981 ± 2,392 from 2003 (Dunham, 2004). This survey was less comparable than the 2001 one because it covered a slightly smaller area. There was an approximately 40% decline in the 13 years between 2001 and 2014. The observed carcass ratio of 6% is not as high as one would expect given the rate of population reduction and might suggest that the level of poaching has reduced in recent years. The corridor between the Mavuradonha Wilderness Area and the rest of the Zambezi Valley range has been changed to **possible range** (Packenham quoting Varden, pers. comm., 2016).

The 2014 estimate for Sebungwe was 3,407 ± 1,215 (Dunham et al., 2015b) which replaces an estimate of 15,024 ± 2,133 from a 2006 survey (Dunham et al., 2006a). The observed carcass ratio of 30% indicates an unsustainably high offtake of elephants. There were almost no elephants left in the communal areas, with the main surviving sub-populations in Matusadona and Chizarira National Parks and the Chirisa Safari Area. Wildlife scouts reported 70-100 elephants in Kavira Forest Land at the western end of Sebungwe (M. Sebele pers. comm. in Dunham et al., 2015b).

The 2014 estimate for North-west Matabeleland was 53,991 ± 7,711 (Dunham et al., 2015a), which replaces an estimate of 49,310 ± 7,051 from 2001 (Dunham & Mackie, 2002). There was no significant difference between the totals although the increased carcass ratio of 7% from 3% in 2001 is a worrying sign. Other aerial sample counts were carried out in 2006 and 2007 but they were not

suitable for comparative purposes (Dunham et al., 2007; Dunham et al., 2006b). Since the 2014 Botswana survey was carried out a month earlier than the north-west Matabeleland survey there is a possibility of double-counting or missing animals that had moved from Hwange into Botswana. There was a surprisingly large number of elephants seen in the Ngwasho/Sepako stratum in Botswana adjoining the southern half of Hwange NP (estimate 11,744) (Chase et al., 2015) and evidence from radio-tracking shows that elephants do move out of Hwange into adjoining areas of Botswana (Chamaillé-Jammes, pers. comm., 2016; Ferguson & Chase, 2010).

Elephant range in North-west Matabeleland has probably increased. Water hole counts and scout reports indicated 308 elephants in the Fuller Forest Land, 165 in Gwaai, Bembezi and Umguza Forest Lands (which has been marked as new **known range**) and 150 in Gwampa/Lake Alice Forest Reserves (M. Sebele pers. comm in Dunham et al., 2015a) which are all recorded as **new populations**. I. Du Preez (pers. comm. in Dunham et al., 2015a) reported an **informed guess** of 36 elephants in the privately owned Stanley & Livingstone Game Reserve (Nakavango).

The estimate for Gonarezhou NP from the 2014 survey was 11,120 ± 2,709 (Dunham & van der Westhuizen, 2015). This replaces an estimate of 4,987 ± 1,577 from a comparable 2001 survey. Another survey in 2009 gave an estimate of 9,123 ± 1,898 (Dunham et al., 2010). The elephant population of Gonarezhou NP is continuing to increase, and is at its highest level since surveys started in 1980. There was a relatively low carcass ratio of 4%. There are limited movements of elephants from Gonarezhou into adjoining parts of Mozambique, and one radio-collared elephant moved from Kruger to Gonarezhou (Henley, 2011).

The 2014 survey of the south east Lowveld included some neighbouring areas. No elephants were observed in the Malapati Safari Area immediately south-west of Gonarezhou but there was an estimate of 332 ± 519 in the Mahenye communal land to the north-east of Gonarezhou, which replaces a zero estimate from the 2001 survey. The 2014 survey gave an estimate of 1,585 ± 1,295 for the Savé Valley Conservancy. This replaces an estimate of 527 ± 310 (Dunham, 2003). There is no statistical difference between the two results. Aerial total counts were carried out in 2013 and 2015 (Jooste & Lenton, 2015; Joubert & Joubert, 2013), which did not cover the entire area: 1,538 and 1,490 elephants were counted respectively. Sengwe, further to the south-west, adjoining the northern boundary of Kruger National Park in South Africa, was not counted in the 2014 survey, but there was an estimate of 35 ± 99 in 2013 (Dunham et al., 2013). In the Malilangwe Conservancy 272 elephants were counted using a helicopter in 2013 (Clegg, 2013). This replaces an estimate of 116 from an aerial total count in 2001 (Dunham, 2002). There was an estimate of 55 in 2014 for the Chiredzi River Conservancy (Warth in Dunham & van der Westhuizen, 2015) compared to 28 in 2001 (Dunham, 2002). Although Chipinge Safari Area is marked as possible elephant range, this is now highly unlikely.

There are a number of small isolated populations in other parts of Zimbabwe, which have updated estimates for 2014. There is an informed guess of 150 elephants for Chegutu Safari Area (Mwale, pers. comm. in Dunham, 2015), formerly Hartley Safari Area, west of Harare and this replaces a guess of 100 from 2001 (Dunham & Mackie, 2002). Some 30 elephants reportedly move from the Nyatana Wildlife Management Area in the north east of the country into Mozambique and this replaces a guess of 150 from 2001 (Dunham & Mackie, 2002).

Some 20 bull elephants were photographed, and there was a further unverified report of 40 elephants, near Mangwe Dam in the vicinity of Home Farm and Greystone Ranches, across the border from Francistown in Botswana (Robertson and Winch, pers. comm. in Dunham, 2015) replacing a guess of three from 2002 (Dunham & Mackie, 2002). A helicopter total count enumerated 174 elephants on Shangani Ranch near Bulawayo (Edwards, pers. comm. in Dunham, 2015) and this replaces a guess of 60 from 2001 (Dunham & Mackie, 2002).

There was a **total aerial count** of 212 elephants in 2014 in the Zimbabwe section of the Mapungubwe Transfrontier Conservation Area which includes Tuli Safari Area, Sentinel, Nottingham and River Ranches (Selier & Page, 2015). This replaces an estimate of 82 from 2001 (Dunham & Mackie, 2002).

There were **informed guesses** in 2014 of 500-600 in Bubye Valley (Leathem & English pers. comm. in Dunham, 2015), and 100 on Bubiana Conservancy (Drummond pers. comm. in Dunham, 2015) in the south of Zimbabwe, replacing guesses of 53 and 50 respectively (Dunham & Mackie, 2002). An old estimate of ten elephants in the Mambali Communal Lands on the Botswana border has been retained from the AESR 2007 (Dunham & Mackie, 2002). A report of 54 elephants on Nuanetsi Ranch is recorded as a **new population**.

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Total Counts	484	–	–	–	1 %	819
Aerial Sample Counts	82,126	8,589	–	–	81 %	65,502
Informed Guesses	20	–	527	567	5 %	3,777
Other Guesses	–	–	1,091	1,221	10 %	8,399
Degraded Data	–	–	17	17	0 %	342
Totals 2015	**82,630**	**8,589**	**1,635**	**1,805**		
Totals 2006	**93,122**	**7,068**	**534**	**625**		
Assessed Range					97 %	78,839
Unassessed Range					3 %	2,389
Total Range					100 %	81,228

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	-10,320	±11,124	0	0	79 %	63,868
New Population	0	0	+713	+713	6 %	4,563
Different Technique	+7	±99	-145	-145	4 %	3,370
Different Area	+20	0	-3	+36	0 %	33
New Guess	-182	0	+519	+559	8 %	6,662
Data Degraded	-17	0	+17	+17	0 %	0
Totals	-10,492	±11,124	+1,101	+1,180	97 %	78,839

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Aerial or Ground Total Counts	819	0	819
Direct Sample and Reliable Dung	65,375	127	65,502
Informed Guesses	3,745	32	3,777
Other Guesses	8,741	0	8,741
Unassessed Range	1,533	857	2,389
Totals	80,213	1,016	81,228

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL			(km²)	LON.	LAT.
Chegutu Safari Area	NG	O	E	2014	150		Dunham, 2015	2	445	29.6°E	17.9°S
Greater Mapungubwe											
Tuli, Maramani, Sentinel, Nottingham	RS	AT	A	2014	212		Selier & Page, 2015	2	1,192	29.4°E	22.0°S
Lower Zambezi Valley											
Chewore II	RS	AS	B	2014	594	333	Dunham et al., 2015c	2	1,058	29.9°E	16.1°S
Chewore I & III	RS	AS	B	2014	2,709	851	Dunham et al., 2015c	2	1,773	29.9°E	16.1°S
Chewore IV	RS	AS	B	2014	0		Dunham et al., 2015c	3	472	29.9°E	16.1°S
Doma Safari Area	RS	AS	B	2014	153	194	Dunham et al., 2015c	2	991	29.9°E	16.1°S
Mavuradonha Wilderness Area	RS	AS	B	2014	0		Dunham et al., 2015c	2	652	29.9°E	16.1 S
Mukwiche Area	RS	AS	B	2014	0		Dunham et al., 2015c	3	337	29.9°E	16.1 S
Protea Farm	-	O	E	2001	7		Dunham & Mackie, 2002	4	14	29.6°E	16.5°S
Rest of Zambezi valley	RS	AS	B	2014	8,200	2,029	Dunham et al., 2015c	1	11,720	29.9°E	16.1 S
Mambali Communal Lands	-	AT	E	2001	10		Dunham & Mackie, 2002	2	327	28.4°E	21.5°S
Mangwe Dam	DA	O	D	2014	20	40*	Dunham, 2015	3	291	28.1°E	20.7°S
Northwest Matabeleland											
Fuller Forest Land	NP	O	D	2014	308		Dunham, 2015	3		25.9°E	18.1°S
Gwaai, Bembesi, and Umguza Forest Lands	NP	O	D	2014	165		Dunham, 2015	2	1,442	28.0°E	19.3°S
Gwampa/Lake Alice Forest Lands	NP	O	E	2014	150		Dunham, 2015	2	860	28.5°E	19.1°S
Hwange National Park	RS	AS	B	2014	45,846	6,244	Dunham et al., 2015a	1	15,168	26.4°E	18.8°S
Matabeleland Communal areas	RS	AS	B	2014	2,201	3,062	Dunham et al., 2015a	2	3,075	26.4°E	18.8°S
Matetsi Safari Complex	RS	AS	B	2014	4,843	2,968	Dunham et al., 2015a	1	4,384	26.4°E	18.8°S
Nakavango	NP	O	E	2014	36		Dunham, 2015	3		25.8°E	18.0°S
Ngamo & Sikumi Forest Areas	RS	AS	B	2014	1,101	993	Dunham et al., 2015a	2	2,332	26.4°E	18.8°S
Nyatana Wildlife Management Area	NG	O	E	2014	30		Dunham, 2015	2	651	32.5°E	16.7°S
Sebungwe											
Binga Communal Lands	RS	AS	B	2014	86	162	Dunham et al., 2015b	2	2,201	28.2°E	17.4°S
Chete Safari Area	RS	AS	B	2014	278	222	Dunham et al., 2015b	2	1,242	28.2°E	17.4°S
Chirisa Safari Area	RS	AS	B	2014	1,200	755	Dunham et al., 2015b	2	1,530	28.2°E	17.4°S
Chizarira National Park	RS	AS	B	2014	747	767	Dunham et al., 2015b	2	2,096	28.2°E	17.4°S
Kariba Communal Areas	RS	AS	B	2014	411	364	Dunham et al., 2015b	2	3,198	28.2°E	17.4°S
Kavira Forest Land	NG	O	E	2014	70	30*	Dunham et al., 2015b	2	287	27.0°E	18.1°S
Lusulu	RS	AS	B	2014	0		Dunham et al., 2015b	2	537	28.2°E	17.4°S

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL			(km²)	LON.	LAT.
Matusadona National Park	RS	AS	B	2014	669	251	Dunham et al., 2015b	2	1,366	28.2°E	17.4°S
North Gokwe Communal Lands	RS	AS	B	2014	0	21	Dunham et al., 2015b	2	3,096	28.2°E	17.4°S
Sijarira Forest Area	RS	AS	B	2014	16		Dunham et al., 2015b	3	261	28.2°E	17.4°S
Shangani Ranch	NG	O	E	2014	174		Dunham, 2015	2	628	29.3°E	19.6°S
Southeast Lowveld											
Bubiana Conservancy	NG	O	E	2014	100		Dunham, 2015	2	1,772	29.8°E	21.1°S
Bubye Valley Conservancy	NG	O	E	2014	500	100*	Dunham, 2015	1	2,895	30.1°E	21.5°S
Chiredzi River Conservancy	DT	O	E	2014	55		Dunham, 2015	2	895	31.6°E	20.8°S
Gonarezhou National Park	RS	AS	B	2014	11,120	2,709	Dunham & van der Westhuizen, 2015	1	4,941	31.9°E	21.5°S
Mahenye Ward	RS	AS	B	2014	332	519	Dunham & van der Westhuizen, 2015	3	221	31.9°E	21.5°S
Malapati Safari Area	RS	AS	B	2014	0		Dunham & van der Westhuizen, 2015	3	177	31.9°E	21.5°S
Malilangwe Conservancy	RS	AT	A	2013	272		Clegg, 2013	3	425	31.9°E	21.1°S
Matibi II Communal Lands	-	AS	E	1996	0		Davies et al., 1996	3	400	31.7°E	21.5°S
Nuanetsi Ranch	NP	O	D	2014	54		Dunham, 2015	2		30.8°E	21.6°S
Save Valley Conservancy	RS	AS	B	2014	1,585	1,295	Dunham & van der Westhuizen, 2015	2	3,496	32.1°E	20.4°S
Sengwe Communal Land	DT	AS	B	2013	35	99	Dunham et al., 2013	2	2,488	31.8°E	21.6°S

*RANGE OF INFORMED GUESS

KEY TO REASONS FOR CHANGE

DA: Different Area; DD: Data Degraded; DT: Different Technique; NA: New Analysis; NG: New Guess; NP: New population; PL: Population Lost; RS: Repeat Survey (RS denotes a repeat survey that is not statistically comparable for reasons such as different season);
— : No Change

KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

ABBREVIATIONS AND ACRONYMS

CONSERVATION FORCE
A Force For Wildlife Conservation

† Baron Bertrand des Clers, Ph.D.
† James G. Teer, Ph.D.
† Bart O'Gara, Ph.D.
† Don Lindsay
† Bert Klineburger

BOARD OF DIRECTORS:
John J. Jackson, III, J.D.
Chrissie Jackson
Philippe Chardonnet, D.V.M.
Shane Mahoney
Renee Snider

July 17, 2019

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

RE: WITHDRAW PRT No. 83100C and PRT No. 35290C

Dear Chief Cogliano:

Please be advised that Dwight Miloff applied for an elephant import permit in 2017 and 2018. We would like to withdraw his applications as he did not harvest an elephant on either trip.

It should be noted that on both the 2017 and 2018 trip to Zimbabwe, Mr. Miloff hunted in the Matetsi Unit 1, near Victoria Falls and saw at least 300 animals each day and only one very big bull elephant, but he was only carrying around 55 lbs of ivory.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

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

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 2 3 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.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Saulsbury	Mark	Arnold	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		N/A

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Odessa	Texas	79765	Ector	USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: unknown No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

d or stamped signatures)

03/05/2018
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: 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 Name:	S.M. Jacobs SMJ Safaris
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.

   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 into the United States, cannot be re-exported.

Applicant's signature (b) (6) [redacted] 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

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.

[X] 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)

Signature of the applicant

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

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)

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
A	7./8 [illegible] africana african elephant	9. 2x Tusks	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. Loxodonta africana African elephant	9. 2x ears, cape, 2 [illegible] panels & tail	10	11 Siter	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 progated 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

Place

28/02/2010

Date

Security stamp, signature and official seal

14 EXPORT ENDORSEMENT

15. Bill of Landing / Air Waybill Number

Block	Quantity
A	
B	
C	
D	

Port of Export / Re-export | Date | Signature | Official stamp and title

Original

Namprint 2105

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. A. Saulsbury

Residential Address:

Country: U.S.A

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
	Buffalo	
CITES I	Crocodile	/
	Dik-dik	/
	Eland	1X
CITES II	Elephant	1X
	Giraffe	1X
	Grey Duiker	1X
CITES II	Hippopotamus	/
	Impala, Black-faced	/
	Impala, common	/
	Klipspringer	/
	Kudu	1X
CITES II	Lechwe	/
	Oryx (Gemsbok)	1X
	Ostrich	1X
	Red hartebeest	1X
	Reedbuck	/
CITES I	Rhinoceros, black	/
CITES I	Rhinoceros, white	/
	Roan	1X
	Sable	/
	Springbok	/

	SPECIES: COMMON NAME	Number
	Steenbok	1X
	Warthog	1X
	Waterbuck	/
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	

*Please report back within 48hours after hunt
*No trophy hunting to be advertised on internet

on the following farms / hunting concessions: Nyae - Nyae Conservancy

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

Cashier receipt No.: 2145667

Issued on: 27.07.17

Amount received: N$

R Hebes R Hebes
Authorizing officer

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

Official MET date stamp

2017 -07- 27

173 S72

The following certificate must be completed immediately after each animal that has been hunted (please print) Reported R. Jansen 14/8/17

Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male Female	Farm		Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
										Name	No			
8/8/17	Elephant.		34,5kg		32,5kg					Nyae-Nyae Conservancy.			[redacted]	
10/8/17	Roan.	68	59	24,	24	175		0	M	Nyae-Nyae Conservancy			(g) (g)	
11/8/17	Oryx.	87	88	20	20	215		0	M	Nyae-Nyae Conservancy				

*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

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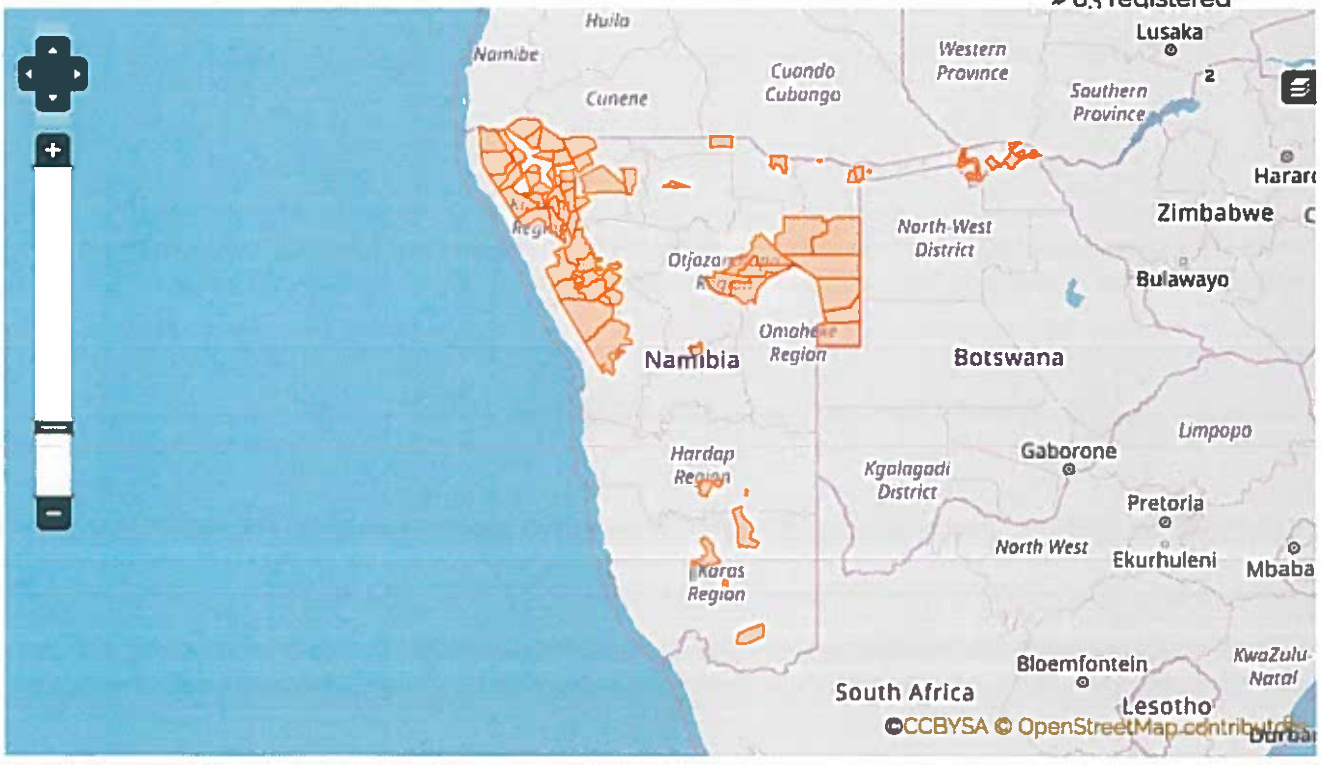
Registered Communal Conservancies

Vital statistics

» 83 registered



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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

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North West game count

NACSO full members

OAT

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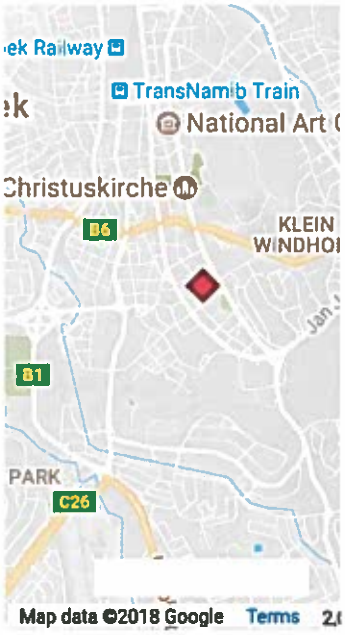

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Conservation Biology

Contributed Paper

Complementary benefits of tourism and hunting to communal conservancies in Namibia

Robin Naidoo,* L. Chris Weaver,† Richard W. Diggle,† Greenwell Matongo,† Greg Stuart-Hill,† and Chris Thouless†‡

*WWF-US, 1250 24th Street NW, Washington, D.C. 20037, U.S.A., email robin.naidoo@wwfus.org
†WWF in Namibia, P.O. Box 9681, Windhoek, Namibia

Abstract: *Tourism and hunting both generate substantial revenues for communities and private operators in Africa, but few studies have quantitatively examined the trade-offs and synergies that may result from these two activities. We evaluated financial and in-kind benefit streams from tourism and hunting on 77 communal conservancies in Namibia from 1998 to 2013, where community-based wildlife conservation has been promoted as a land-use that complements traditional subsistence agriculture. We used data collected annually for all communal conservancies to characterize whether benefits were derived from hunting or tourism. We classified these benefits into 3 broad classes and examined how benefits flowed to stakeholders within communities under the status quo and under a simulated ban on hunting. Across all conservancies, total benefits from hunting and tourism increased at roughly the same rate, although conservancies typically started generating benefits from hunting within 3 years of formation as opposed to after 6 years for tourism. Disaggregation of data revealed that the main benefits from hunting were income for conservancy management and food in the form of meat for the community at large. The majority of tourism benefits were salaried jobs at lodges. A simulated ban on trophy hunting significantly reduced the number of conservancies that could cover their operating costs, whereas eliminating income from tourism did not have as severe an effect. Given that the benefits generated from hunting and tourism typically begin at different times in a conservancy's life-span (earlier vs. later, respectively) and flow to different segments of local communities, these 2 activities together may provide the greatest incentives for conservation on communal lands in Namibia. A singular focus on either hunting or tourism would reduce the value of wildlife as a competitive land-use option and have grave repercussions for the viability of community-based conservation efforts in Namibia, and possibly other parts of Africa.*

Keywords: communal lands, community-based conservation, financial benefits, hunting ban, in-kind benefits, stakeholders

Resumen: *El turismo y la caza generan ingresos públicos sustanciales para las comunidades y los operadores privados en África, pero pocos estudios han examinado cuantitativamente las compensaciones y las sinergias que pueden resultar de estas dos actividades. Evaluamos las oleadas de beneficios financieros y de pago en especie provenientes del turismo y la caza en 77 zonas de conservación comunal en Namibia desde 1998 a 2013, donde la conservación de vida silvestre basada en la comunidad ha sido promovida como un uso de suelo que complementa la agricultura tradicional de subsistencia. Usamos datos colectados anualmente de todas las zonas comunales para caracterizar si los beneficios se derivaron de la caza o el turismo. Clasificamos estos beneficios en tres categorías generales y examinamos cómo los beneficios fluyeron hacia los accionistas dentro de las comunidades bajo el status quo y bajo una prohibición simulada de la caza. En todas las zonas de conservación comunal, los beneficios totales de la caza y el turismo incrementaron aproximadamente a la misma tasa, aunque en estas zonas se comenzaron a generar beneficios de la caza normalmente dentro de los 3 años de formación, en contraste con del turismo que se generaron después de 6 años. La desagregación de los datos reveló que los principales beneficios de la caza fueron los ingresos para*

‡*Current address: Save the Elephants, Marula Manor, Marula Lane, Karen, P.O. Box 54667, Nairobi 00200, Kenya*
Paper submitted April 9, 2015; revised manuscript accepted October 6, 2015.

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are not monolithic entities; rather, they are composed of different groups of people who will experience different costs and benefits from wildlife conservation (Agrawal & Gibson 1999; Roe et al. 2009). For example, wealthy cattle owners and poor subsistence farmers will have different perceptions of wildlife conservation given the particular costs and benefits they are likely to experience. Diversifying benefit streams from wildlife conservation so that the variety of stakeholders within local communities are incentivized to promote or at minimum tolerate living with wildlife will provide the greatest likelihood that conservation as a land use will ultimately prove more attractive than wildlife-unfriendly alternatives. Because communal lands comprise a large fraction of rural Africa (up to 500% more than state-managed forest reserves and national parks [Alden Wily 2011]), management of these lands will play a huge role in determining the success or failure of biodiversity conservation efforts across the continent.

We focused on how different types of benefits provided by wildlife vary over time, space, and community stakeholder groups in communal conservancies in Namibia. Namibia's Community-Based Natural Resource Management (CBNRM) program began in the mid-1990s, when progressive legislation for the devolution of conditional rights to natural resources allowed communities to register areas of customary landholding as "communal conservancies." Registering these conservancies (involving developing zoning and sustainable resource management plans and a constitution) allows local communities to manage and benefit from wildlife and other natural resources on their traditional lands. Prior to the legislation, natural resources were the sole property of the state. Although wildlife has been used by people for millennia in the region that is now Namibia, the last century was characterized by declines in various species, starting with the rinderpest outbreak at the end of the 19th century, followed by overhunting of big game species by colonial hunters, and more recently by a major drought combined with a poaching increase in the 1980s (Owen-Smith 2010). Namibia's CBNRM program is widely recognized as having contributed to a strong recovery of wildlife in large parts of the country, through the creation of social and economic incentives for the sustainable coexistence of wildlife and people on communal lands (Owen-Smith 2010; Naidoo et al. 2011*b*; NACSO 2013). Additionally, the principles used to incentivize communities to steward wildlife across very large spatial scales are already being adopted by numerous other countries in Africa and beyond (NACSO 2013). We examined how changes in benefits over time generated on communal conservancies in Namibia vary according to whether they were derived from tourism or hunting (the 2 most significant benefits derived from wildlife). We also assessed how these benefits flow to different stakeholders within local communities and how factors such as time of establishment and changes in resource management policies affect such benefit flows on communal lands.

Methods

We used data from 77 communal conservancies registered by 2012 in Namibia to examine benefit flows associated with hunting and photographic tourism. The first four of these conservancies were established in 1998, and we used data through the 2013 calendar year for all of them. For both hunting and tourism, conservancies negotiate agreements with private operators. The agreements between conservancies and operators specify the portion of income the conservancy receives (typically 8–12% of total lodge revenue and from 30–75% of trophy price, depending on the species) and jobs to be offered to community members with the operation (from 20–50 for tourism lodges, depending on factors such as size and location, and 8–10 for hunting camps). In addition, community members hunt for subsistence and allow local sales of meat from wildlife through game cropping. Information on fees paid to conservancy management committees; salaries of community members employed in the tourism or hunting industry; and nonfinancial benefits (primarily meat from hunting, but also meals, training, human-wildlife conflict compensation, and other donations to the community at large) is compiled annually by every conservancy. Financial reporting of conservancies is supported by various nongovernmental organizations, is ground-truthed, and is double-checked against analogous reports from tourism and hunting operators.

We used these data and categorized each source of benefit as to whether it was derived from tourism or from hunting. The CBNRM program uses the price of buying alternative meat as the value of wild meat distributed from animals that were hunted (replacement-cost shadow price approach). In 2013, it was 18 Namibian dollars/kg of meat (NACSO 2013). This shadow price can vary and is adjusted from year to year to reflect supply and demand, but the same rate is applied across the country in order to maintain comparability of meat benefits generated in different regions. We used a consumer price index produced by the Bank of Namibia to standardize benefit figures from all years into constant 2013 Namibian dollars. We subsequently expressed all figures in 2013 U.S. dollars (U.S.$) based on the average monthly exchange rate in 2013 of U.S.$1 = N$9.64.

We divided benefits into the 3 classes (described above) because each represented a different type of gain that is channeled to different parts of a conservancy and has different implications for the sustainability of the conservancy and for its livelihood value to members. Income (i.e., fees from lodge and hunting concessions) to management committees is used by conservancies to cover operational and management costs

these financial time series by calculating 4 metrics per conservancy: temporal trend (slope from a linear regression of benefits on year); volatility (root mean square error from the linear regression); end point (magnitude of benefits in 2013); and lag time between year conservancy registered and year the first benefits were generated.

We used t tests on these metrics to assess whether temporal flows of benefits to conservancies were significantly different between hunting and tourism.

Results

Of the 77 conservancies established by 2012, 25 reported not generating any benefits from either hunting or tourism. Considering all conservancies in Namibia's CBNRM program, aggregate benefits increased over time (Fig. 1). Total benefits from tourism and hunting were similar in the early years of the program, but tourism benefits exceeded those from hunting from 2003 to 2010, whereas from 2011 to 2013 the benefits from hunting were greater than tourism benefits (Fig. 1a). Although fee payments to conservancies and nonfinancial benefits (primarily meat) from hunting accumulated at higher levels than those from tourism (Figs. 1b and d), total salaries from tourism enterprise jobs increased 10 times faster than salaries from hunting jobs (Fig. 1c). Nonfinancial benefits from tourism dropped sharply from 2011–2013 relative to continued increasing nonfinancial benefits from hunting (Fig. 1d), a result that may have coincided with the worldwide economic downturn in 2008 and fewer available resources for tourism companies to make additional contributions to conservancies.

Conservancies were formed in roughly 4 cohorts that coincided with (1) initial heavy donor investment (1998–2001, 15 conservancies), (2) a period of declining donor investment (2003–2005, 29 conservancies), (3) an upturn in investment peaking in 2009 (2006–2009, 15 conservancies), and (4) a further increased-investment phase (2011–2013, including 18 conservancies registered by the end of 2012). The earliest conservancies, in cohort 1, had similar levels of total benefits for the first 6 years after registration, after which benefits from both hunting and tourism continued to increase but at a faster rate for tourism (Fig. 2a). Conservancies in cohort 2 (Fig. 2b) had roughly similar rates of growth in total benefits from tourism and hunting, whereas cohorts 3 (Fig. 2c) and 4 (Fig. 2d) earned virtually no benefits from tourism and had either moderate (cohort 3) or low (cohort 4) benefits from hunting.

Disaggregating the national-level data revealed that pathways for generating benefits over time varied substantially among conservancies (Supporting Information). Of the 52 conservancies that derived some level of benefits from wildlife, 28 derived all or almost all of their total benefits from hunting, 6 derived all or almost all benefits from tourism, and 18 had substantial levels of benefits from both hunting and tourism.

Although there was a tendency for the total benefits from tourism to be higher than those from hunting, there were no significant differences for any of the conservancy time series metrics (Table 1). The only exception to this was the lag time between conservation formation and the beginning of benefits generation. After their formation, conservancies derived benefits from hunting approximately twice as quickly as they derived benefits from tourism (Table 1). On average, conservancies started generating benefits from hunting about 3 years after their formation, whereas it took 6 years, on average, after conservancy formation to start generating benefits from tourism.

In addition to temporal and spatial differentiation, there were differences in how benefits from tourism and trophy hunting flowed to the different constituencies contained within communal conservancies (Fig. 3). Based on detailed financial accounting data from 2011–2013, 58.3% of the financial benefits from tourism were in the form of jobs to conservancy members at joint-venture lodges, whereas 30.3% of the benefits were lodge contractual fees used for conservancy management and 11.5% were nonfinancial benefits to the community at large less.

In contrast, the majority (64.3%) of the benefits from hunting were in the form of cash for the operation of the conservancy, and a substantial fraction went to the community at large in the form of meat from hunted animals (32.0%, or approximately 1.4 million kg over the 3 years). Conservancies used income from trophy hunting and tourism in a variety of ways that benefited the entire community (Fig. 3), most importantly for the salaries of conservancy employees and for other conservancy operating costs, but also for compensation for wildlife conflict, payments to traditional authority structures, direct cash dividends, community-level projects, and infrastructure development. Our data suggest that operational costs, conservancy employee salaries, and the various benefits to the community at large were mostly derived from hunting because hunting operators paid fees from 2011–2013 of $5.41 million (72% of the total), whereas tourism operators paid $2.13 million (28%).

Currently, many conservancies cover their operating costs with income derived from trophy hunting and from tourism that is directed to conservancy management. Simulation of a trophy hunting ban showed a reduction in the number of conservancies with incomes greater than operating costs in 2013, from 74% (37 of 50) under the status quo to 16% (8 of 50) when conservancy income from hunting was eliminated. If this reduction were to occur throughout the country, it would cover nearly 50,000 km^2 (Fig. 4). When conservancy income from tourism was removed, the effect was again negative but

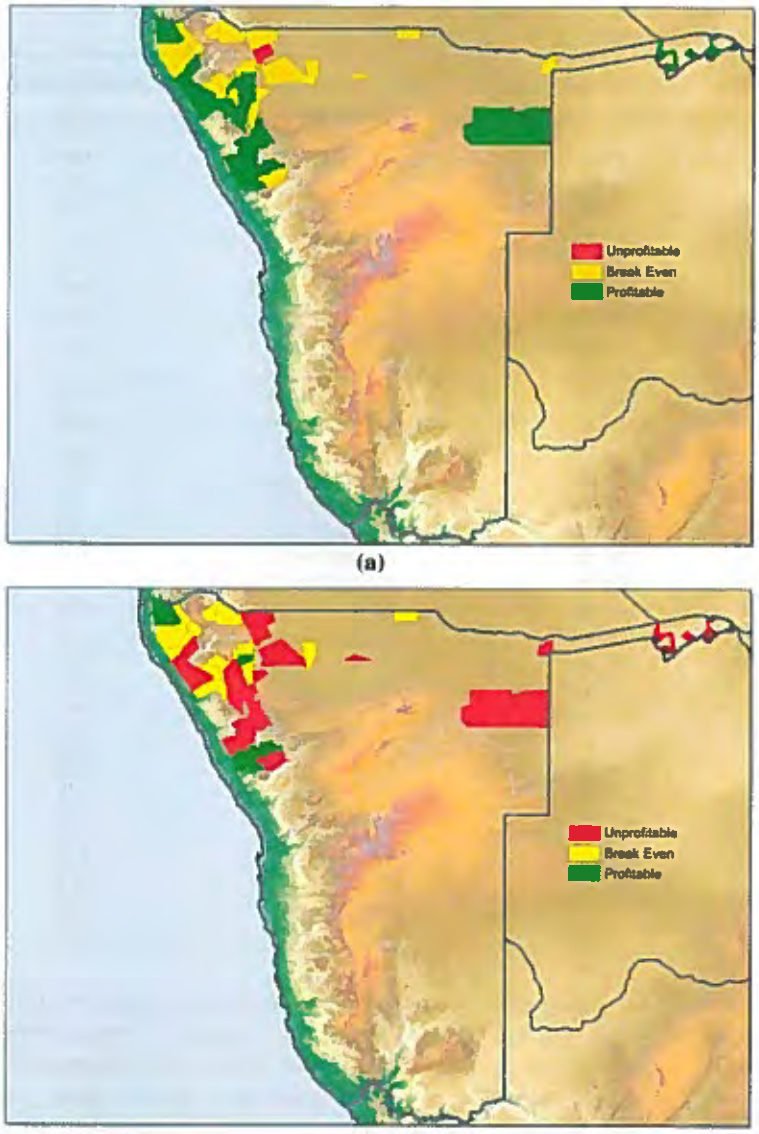

Figure 4. Revenues minus operating costs for 50 communal conservancies for which detailed management cost data were available in 2013 under (a) the status quo and (b) a simulated trophy hunting ban. Break-even conservancies indicate those for which revenues and operating costs are within $5000 of one another.

less marked; 59% of conservancies remained able to cover their operating costs.

Finally, of the 303 animals harvested by trophy hunters in 2013, individuals from 2 of the Big-5 (buffalo [*Syncerus caffer*], elephant [*Loxodonta africana*], lion [*Panthera leo*], leopard [*Panthera pardus*], rhinoceros [*Diceros bicornis* and *Ceratotherium simum*) species hunted in Africa, buffalo and elephant, accounted for 78.3% of hunting revenue; over 55% was attributable just to elephants (Table 2).

Discussion

Despite the importance of both tourism and hunting to conservation, and the debate surrounding their implementation, we are the first study to use detailed quantitative data across multiple jurisdictions and over a lengthy time span to directly compare the financial performance of these two activities. Our data from 77 Namibian conservancies from 1998 to 2013 showed that trophy hunting and tourism reached similar aggregate levels but began to generate benefits at different times (earlier vs. later in a conservancy's life-span) and flowed to different beneficiaries (community management committees and the community at large vs. individual employees). Previous work in Namibia has demonstrated that benefits from hunting and tourism are also spatially differentiated; conservancies are more likely to generate benefits from hunting in areas with diverse wildlife and Big-5 species, whereas the presence of black rhinoceros (*Diceros bicornis*) and broader environmental conditions (distance to tourist routes, topographical diversity, and rainfall) are correlated with higher benefits from tourism (Naidoo et al. 2011*b*). In addition, the first conservancies established were typically those with the highest potential to

where nature-based tourism is not viable (e.g., Blom 2004).

Benefits from trophy hunting and tourism also accrue to different stakeholders within communal conservancies. Benefits from tourism were mainly in the form of employment income to conservancy members who are hired to work at lodges built on conservancy land. Although these employees normally come from among a group of conservancy members nominated by the conservancy, ultimately staff are hired based on their knowledge, communication skills, and potential. Jobs of any kind are extremely rare in remote rural areas and thus highly sought after; therefore, tourism is viewed very favorably by local residents who are employed in the industry (Suich 2010; Silva & Motzer 2015). In contrast, agreements between communities and hunting operators provide significantly higher levels of income for conservancy management, as well as greater nonfinancial benefits (largely from meat) distributed directly to the community at large.

The income to management committees is essential; without it, most communal conservancies in Namibia would be unable to cover their operating costs (which three-quarters of the 50 conservancies we assessed were doing). Conservancies unable to cover their operating costs will likely cease to pursue conservation as a viable land use because without conservancy income, game guards cannot be paid, management and monitoring plans cannot be developed and instituted, the sense of local ownership over natural resources dissipates, and wildlife becomes much more vulnerable to declines from poaching and overharvest. This link between income from hunting and the conditions and incentives that permit wildlife to persist as an economically viable land use is critical but often unrecognized. Our data also show that almost 80% of hunting benefits are delivered by two species (elephant and buffalo); elephants alone generate over 50% of all hunting benefits from an increasing population base (7500 individuals in 1995 to over 20,000 in 2012 [Craig 1999; Ministry of Environment and Tourism 2012]). Therefore, even a targeted hunting ban on elephants or an import ban such as those that currently prevent the import of elephant trophies from Tanzania and Zimbabwe into the United States is likely to have a very negative impact on Namibia's CBNRM program by severely undermining conservancy governance structures and incentives for conservation. Anecdotal accounts of the impact of Botswana's 2014 hunting ban suggests that similar negative consequences (an increase in poaching for meat and trade and increased collaboration of local communities with international poaching gangs) may be occurring there (Somerville 2015).

Although we found there were impressive financial gains from trophy hunting, the sustainability (both ecological and economic) of these operations on communal lands in Namibia is rightly of major concern. As such, it is regulated via annual estimates of species' populations and harvest quotas derived in agreement with local communities and the Ministry of Environment and Tourism (NACSO 2013). Although data from the various conservancy landscapes within the country indicate populations in these areas have generally increased since the advent of Namibia's CBNRM program (Naidoo et al. 2011*b*), evidence on possible negative impacts of trophy hunting on wildlife populations in other parts of Africa (Packer et al. 2010; Lindsey et al. 2013*a*) means that trophy hunting must be carefully monitored in Namibia to ensure the same does not happen. There have been no assessments on how trophy size or quality in particular species may be changing over time, a concern that has been raised for trophy hunting in Africa (Crosmary et al. 2013) and that may result in undesirable genetic changes within hunted populations (Coltman et al. 2003). It is therefore critical that data on the size and quality of trophy exports be analyzed for Namibia's CBNRM program to inform monitoring, evaluation, and management of the trophy-hunting industry. High-profile, apparently illegal hunts such as of lions on the borders of national parks in Zimbabwe, and ethically dubious practices, such as canned hunting of captive animals, also illustrate that the industry itself must play a greater role in addressing issues that throw the sector into disrepute. Finally, growing human populations and a tremendous increase in elephant poaching for the international ivory market may eventually result in reduced quotas of elephants and therefore threaten the financial benefits communal conservancies have generated through trophy hunting.

The sustainability of photographic nature-based tourism in Africa and beyond has also come under scrutiny (Buckley 2004; Newsome et al. 2012). In Namibia relevant issues for ecological sustainability include impacts of intense wildlife viewing on animal behavior, localized environmental implications of the development of tourism infrastructure (lodges, campsites, roads, disposal facilities, etc.) in sensitive arid environments, and climate-change impacts from the carbon emissions of increasing numbers of international visitors. As with trophy hunting, there are few studies, particularly for the first two considerations, that have evaluated the sustainability of tourism initiatives on communal conservancies in Namibia. Furthermore, from a socioeconomic point of view nature-based tourism on communal lands in Namibia has been criticized as having power imbalances or elite capture issues that render communities unable to secure significant shares of the benefits (Hoole 2010; Lapeyre 2011), even though residents of conservancies with high benefit levels are themselves strongly supportive of tourism (Silva & Motzer 2015). Finally, to assess more fully the overall costs and benefits of wildlife conservation on communal lands in Namibia, there is a need for greater investigation of both human-wildlife conflict costs and who bears them, as well as the opportunity

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IUCN

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 km²
Range Area	164,069 km² (20%)
Protected Range	18 %
Information Quality Index (IQI)	0.43
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Namibia's elephants occur across the northern region of the country, mostly in national parks and community areas. Their range encompasses a wide variety of habitats, from the extremely arid north-west Kunene Region to the well-watered Zambezi (formerly Caprivi) Region, where the elephants form part of the KAZA transfrontier population. Although poaching has increased in the Zambezi Region in the past ten years, it is not seen as a significant threat in Etosha National Park or for populations in Khaudum National Park and Kunene Region.

Elephant hunting takes place in Namibia, and the revenue generated provides significant income to community conservancies (Naidoo et al., 2006). From 2007 to 2015, Namibia declared an annual export quota of elephant hunting trophies of 180, defined as tusks from 90 animals (CITES, n.d.-a).

Namibia's elephant management plan was published in 2007 (Ministry of Environment and Tourism, 2007).

In 2008, Namibia undertook an approved one-off sale of 7,503 kg of ivory to Japan and China, at a price of USD $1,147,369 (Wijnstekers, 2011).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Namibia is 22,754 ± 4,305 at the time of the last survey for each area. There may be an additional 90 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 84,283 km^2, which is 52% of the estimated known and possible elephant range. There remains an additional 48% of the estimated range for which no elephant population estimates are available.

The elephant population of Namibia has continued to increase although, with wide confidence limits in aerial surveys and elephants moving across international borders, it is not possible to be precise about how great the increase in the national population has been.

There are four main populations, the transfrontier population (with Zambia, Angola, Botswana and Zimbabwe) in the Zambezi Region, in Khaudum National Park in the north-east, the Etosha National Park population, and the Kunene population in the north-west which includes the "desert" elephants.

There has been an increasing trend in elephant numbers in the Zambezi Region since surveys started in the 1980s. This is likely to have been a result of both natural growth and movement from neighbouring countries. **Aerial sample counts** were carried out in 2007, 2011, 2013, 2014, and 2015, giving estimates of 8,380, 10,847 ± 3,580, 9,165 ± 2,016, 14,097 ± 2,678 and 13,116 ± 3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725 ± 2,206 (Kolberg, 2004). There was also a total count carried out in 2007 (Chase, 2007) and a sample count in 2008 (Kolberg, 2008). However the latter was carried out with an inexperienced crew and the results were thought to be a considerable underestimate (Kolberg, 2008).

The elephant population of Khaudum NP and the neighbouring community conservancies of Nyae Nyae and N≠a Jaqna have been established since the 1980s, with the provision of artificial water and movements across the border from Botswana. Three **aerial sample counts** were carried out in 2011, 2013 and 2015 giving estimates of 4,731 ± 1,940, 3,638 ± 1,164, and 6,413 ± 2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758 ± 2,289 for Khaudum, 61 ± 115 for N#a Jaqna (Kolberg, 2004) and 967 ± 481 for Nyae Nyae (Stander, 2004). None of these are significant differences.

There is a limited movement of elephants between Angola and the Kavango region to the north-west of Khaudum (Terblanche, 2016).

There is a small elephant population in the Mangetti area between Khaudum and Etosha. The AESR 2007 indicated that they occupy the Mangetti Game Reserve, whereas their range is actually concentrated around the Mangetti Cattle Ranch to the west, and also probably extends into the Ukwuangali communal area to the north. Ninety individuals were observed in Mangetti in 2015 (Lindeque, pers. comm., 2016). This **informed guess** replaces one of 20 from 2005 (Ministry of Environment and Tourism, 2005).

Etosha National Park in northern Namibia has an increasingly isolated elephant population, since the perimeter fencing has been upgraded in recent years. There has been a gradual increase in elephant numbers, moderated by deaths from anthrax and poaching. Aerial sample counts were carried out in 2011 and 2012, giving estimates of 3,378 ± 1,756 and 2,810 (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of 2,911 ± 637 (Kilian, 2015) and replaces an estimate of 2,057 ± 598 from 2004 (Kilian & Kolberg, 2004).

It is technically very difficult to count the widely scattered elephant population in the Kunene Region, which includes the 'desert elephants' in the dry, western extremity of the range and there has been controversy about the numbers in this area. A combined sample block count and **aerial total count** was carried out by helicopter in 2011, giving an estimate of 314 ± 154 (MET, 2012). This replaces an estimate of 210 ± 157 from a 2005 survey (Ministry of Environment and Tourism, 2005). It should be noted that the count did not include the extreme northern part of the range around Opuwo, nor the farms to the south of Etosha. There has been some range expansion to both the south and north, with elephants now being resident in the Ugab river basin and about ten elephants resident in the northern Etanga area (Owen-Smith, pers. comm., 2014). The area of **known range** has been changed, and the Etanga group is shown as a point record on the map. The Kunene population appears to have been increasing in numbers and range, despite evidence that the 'desert elephant' sub-population in the 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 (km²)
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
Totals 2015	**22,754**	**4,305**	**90**	**90**		
Totals 2006	**15,807**	**3,276**	**20**	**20**		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
Total Range					100 %	164,069

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
Totals	+6,947	±5,410	+70	+70	52 %	84,283

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Direct Sample and Reliable Dung	65,438	2,683	68,121
Informed Guesses	15,903	259	16,162
Unassessed Range	31,130	48,655	79,786
Totals	112,471	51,598	164,069

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL			(km²)	LON.	LAT.
Etosha National Park	RS	AS	B	2015	2,911	637	Kilian, 2015	1	18,549	15.8°E	19.0°S
Khaudum-Kavango	RS	AS	B	2015	4,149	1,864	Gibson & Craig, 2015b	2	5,843	20.7°E	19.3°S
Kunene	RS	AS	B	2011	314	154	MET, 2012	1	40,887	14.1°E	20.0°S
Mangetti Area	NG	O	D	2015	90		Lindeque, pers. comm., 2016	2	2,558	18.5°E	18.6°S
Nyae Nyae Conservancy	RS	AS	B	2015	2,264	1,729	Gibson & Craig, 2015b	2	7,001	20.7°E	19.3°S
Zambezi Region	RS	AS	B	2015	13,116	3,413	Gibson & Craig, 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

*KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

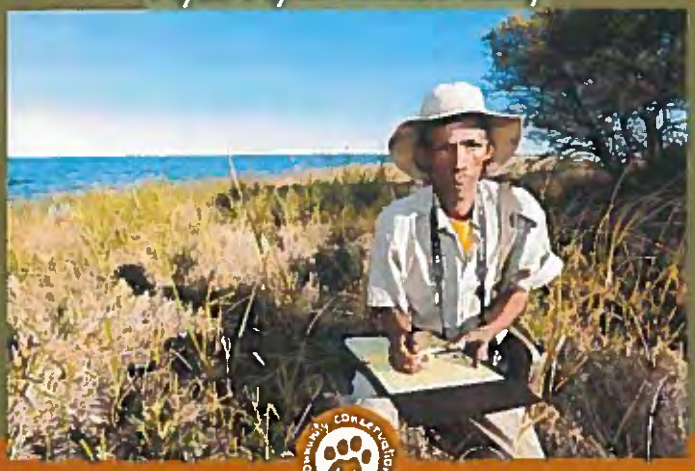
*PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

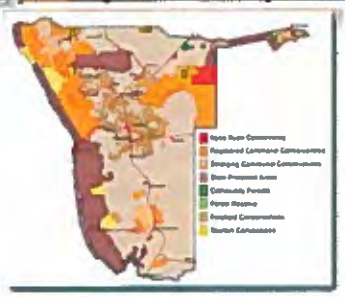
Malengue
Cuando
Kafue GMA
ANGOLA
ZAMBIA
Lubango
Namibe
Bikuar NP
Mongu
Kafue NP
Moçâmedes Partial Reserve
Mupa NP
Mavinga Partial Reserve
Zambezi
Iona NP
Southeast Angola
Cubango
Sioma Ngwezi NP
Bongola
Mucusso GR
Luiana NP
Zambezi Region
Kasane
Bwabwata NP
Mudumo NP
Skeleton Coast NP
Okavango
Mamili NP
Khaudum-Kavango
Mangetti Area
Chobe NP
Etosha NP
Khaudum NP
Tsumeb
Mangetti NP
Moremi GR
Northern Botswana
Nyae Nyae Conservancy
Maun
Kunene
Nxai Pan NP
Otjiwarongo
Makgadikgadi NP
Ghanzi
Ghanzi District
National West Coast Tourist RA
NAMIBIA
BOTSWANA
WINDHOEK
Central Kalahari GR
Swakopmund
Khutse GR
Keetmanshoop
Luderitz
Orange
Vaal
SOUTH AFRICA
0 90 180 270 360 450 540km
Int'l Boundaries
Rivers & Lakes
ELEPHANT RANGE
Known

Living with wildlife

the story of Nyae Nyae Conservancy



Nyae Nyae – Ju|hoansi for 'the place without mountains, but rocky'



A CONSERVANCY IS...

- 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 elected 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
- zoned for multiple uses to minimise conflict and maximise the interests of all stakeholders

Conservancies
enable development and conservation over large areas...

MILESTONES AND SUCCESSES

1991 – an NGO that over time evolves into the Nyae Nyae Development Foundation of Namibia is formed to support the community
1994 – the Nyae Nyae community begins the process to register as a conservancy
1996 – policy changes allow communal area residents to benefit from wildlife and tourism by forming conservancies
1998 – Nyae Nyae Conservancy is registered in February, becoming the first communal conservancy in Namibia
1999 – the Nyae Nyae Conservancy office is established at Bateleka
99-04 – each year, wildlife is re-introduced into the conservancy, including springbuck, red hartebeest, gemsbok, eland, kudu and blue wildebeest, with a total of 2,300 animals being introduced
2001 – an annual game count is started in Nyae Nyae
2002 – the Event Book monitoring system is implemented in Nyae Nyae
2003 – the conservancy office is moved to Tsumkwe
04/05 – a large game-proof camp is erected to manage the remaining Nyae Nyae buffalo population and avoid contact with livestock
2006 – the Nyae Nyae Trust is formed
2008 – black rhino are re-introduced into the conservancy
2009 – an application is lodged with the Ministry of Environment & Tourism to extend the borders of the conservancy to include the village of N'homa
2011 – an application is lodged with the Ministry of Agriculture to register Nyae Nyae Community Forest, having the same borders and management structures as the conservancy

QUICK FACTS

Region: Otjozondjupa
Approximate population: 2,300
Date of registration: February 1998
Size: 8,992 square kilometres
Main language: Ju'hoansi

interacting cultures and dynamic communities committed to sustainability – people living as Nyae Nyae share a common vision for managing their area and its resources

vast, diverse and spectacular landscapes – Nyae Nyae Pans, bushland, magical baobabs... a healthy environment diversifies economic opportunities and drives economic growth

charismatic, free-roaming wildlife – elephant, lion, leopard, wild dog, diverse plains game, abundant birdlife... wildlife generates a variety of benefits for local people

people are living with wildlife, are managing natural resources wisely and are reaping the benefits...

A LITTLE HISTORY

Prior to Namibia's independence in 1990, 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 community safety. Ground-breaking legislation passed in the mid-nineties laid the foundation for a new approach to the sustainable use of natural resources. By forming a conservancy, people in communal areas can now actively manage – and generate benefits from – wildlife and other resources in their area, encouraging wildlife recoveries and environmental restoration. While a conservancy is a natural resource management structure, it is defined by social ties. Conservancies unite groups of people with the common goal of managing their resources. Today, over 60 communal conservancies embrace one in four rural Namibians, underlining a national commitment to both rural development and conservation.

Nyae Nyae is the oldest, as well as the second largest conservancy in the country, covering close to 9,000 square kilometres. Most of the 2,300 residents are from the Ju'hoansi ethnic group, a sub-group of the San. Historically, the Nyae Nyae area occupied by the Ju'hoansi stretched into Botswana in the east, north beyond what is today Khaudum National Park, south to the settlements of Eiseb and Gam and west beyond the settlement of Aasvoëlnes. Today, Botswana creates the eastern border of the conservancy, while to the south, west and north, Otuzu and Nhe-Jaqna Conservancies and Khaudum National Park adjoin Nyae Nyae, and in turn border onto other conservancies to form a huge contiguous conservation landscape.

The long process to mobilise, unite and support the Nyae Nyae community in forming a conservancy in a sense already began prior to Namibia's independence. In 1981, what is today the Nyae Nyae Development Foundation was formed to support the community in development and resource management. By the time the conservancy legislation was passed in 1996, the Nyae Nyae community was well placed to register the conservancy, which was gazetted in early 1998.

***San or Bushman?** Both terms have a slightly derogatory origin. Bushman originates from the Dutch word boschman – an outcast who lives in the bush. San comes from the Nama 'saa' referring to poor people without cattle. While the Regional San Conference of 1993 adopted San as the official term, Bushman has also lost much of its negative connotation and today is taken to refer more to the great environmental knowledge and bush skills of the San.*

Conservancies are living landscapes...

The culture of the San is legendary, as often idealised view of a balanced existence within the natural environment. The San have superb hunting skills and 'bush knowledge' That been 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/'hoansi have roamed across 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 Kantee Daqm, a museum guide.

The vast, mostly unfenced Nyae Nyae environment retains a strong wilderness atmosphere, which is enhanced by the fascination 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 seasonal surface water in the so called 'pannetjieveld' (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.

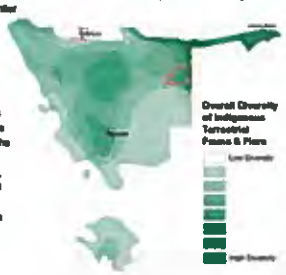
Huge baobabs punctuate the savanna woodland and create a sense of ancient Africa. Rainfall in Nyae Nyae is low and unpredictable, with an annual average of around 450 millimetres. The harshness of the environment is increased by high temperatures and extremely high evaporation. However, the water table 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 Otjozondjupa Region.

a seemingly endless world of bushland and pannetjieveld, 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 hyaena 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 giraffe, eland, kudu, blue wildebeest, roan, gemsbok, hartebeest, springbok, duiker, steenbok, warthog, spotted and brown hyaena, cheetah and jackal. More than 200 bird species have been recorded in the conservancy. Birding around the seasonal Nyae Nyae Pans is spectacular after good rains, when more than 10,000 waterbirds of over 60 species gather here, including great painted snipes, flamingos, wattled cranes and breeding stork 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 manketti, teakwood, terminalia, false mopane and a variety of acacia trees, as well as devil's claw and Kalahari melon.

Around Nyae Nyae... The nearby Khaudum National Park is known especially for its numbers of elephant and roan, as well as for its wilderness feel. Both Nyae Nyae and Khaudum 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.



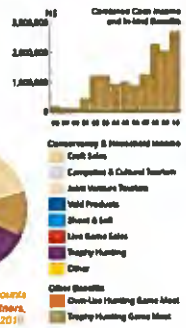
Conservancies empower rural people...

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 to land. The literacy rate is low at around 30%, with school attendance at only half the national average. The few opportunities for formal employment are thus further 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 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 30 years have attempted to move the San into modern society. Schools and health facilities have been developed, permanent water points have been established and livestock herding and gardening have been promoted. These activities have had a large influence on San culture. The Nyae Nyae Conservancy has returned natural resource use 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 stock water source, was established as the administrative centre of the area in 1958. An area of 30 square kilometres around Tsumkwe is excluded 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 hospitals to outside the conservancy at Mangetti Dune and Grootfontein. There are five primary schools in Nyae Nyae and Ju/'hoan speakers participating in the Village School Programme have access to schooling in their mother tongue.

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



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 2010.

Harvesting of devil's claw for the health industry is practiced widely, providing income to around 300 to 400 harvesters. Craft production has become an important source of income for both men and women, with over 300 craft producers in the conservancy. While the men concentrate on producing traditional implements such as bows and arrows, women create exquisite ostrich egg shell jewellery and other beautiful items. The Gihumbu Crafts shop, located next to the conservancy office, is a superb local outlet for these crafts.

The C44 gravel road provides **access for visitors** to the area, connecting Tsumkwe with the B8 tar road between Grootfontein and Rundu in the west, as well as the Oshi border post leading to Botswana in the east. Four wheel drive is needed beyond the gravel road, both within Nyae Nyae and to access Khaudum, or when proceeding into Botswana.

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**. Veld food and seasonal 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 distributes individual benefits each year, including annual cash payments, meat from trophy and own-use hunting, the supply of blankets, solar radios and other goods.

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 and benefit areas in 2010.

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 museums at Mountain Pos and Doo Pos, with income going directly to the villages. Another excellent cultural experience, the Living Hunter's Museum, is located at //Xa:/aba village along the track to Khaudum and includes a campsite. Wilderness campsites are also located at Mahuri, Djoima and Kramertanlap and, although undeveloped, 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 teams and photographers, and the conservancy has received income from filming and photographic fees, although guidelines for these activities need to be improved and enforced.

Conservancies facilitate sustainability...

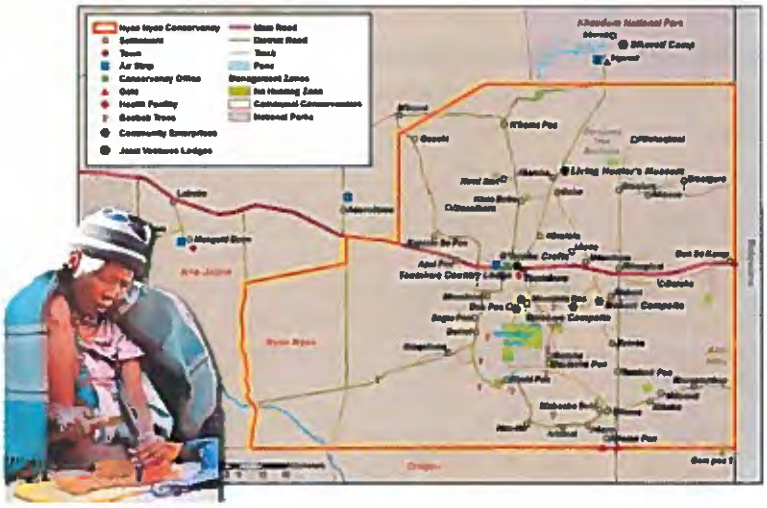
Nyae Nyae is divided into four areas for management purposes. The **management structure** includes the conservancy board, made up of representatives of each area, as well as the paid positions of chairperson and conservancy manager. The board focuses on appointing the management committee and manager, 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 CBNRM field officer, three water team staff, a craft trainer, a craft shop coordinator (funded through shop income), a devil's 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 decide on benefit 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 Tsumkwe and integrates Ghanzi Crafts. 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 Nyae Nyae Development Foundation.

the Nyae Nyae Conservancy provides vital structures for managing the communal natural resources of the area in a way that enhances development and ensures sustainability

Activities... The conservancy is based on the traditional Ju'/hoansi /aixa land management system, which was recognised by government in 1991. Members have the right to hunt approved game within their /aixa on foot with bow and arrows, spears or bird traps. Hunting is reported to the /aixa 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" at waterholes 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 Nyae Nyae Development Foundation and other NGOs, the conservancy has developed "elephant proof" water reservoirs for villages, which has reduced conflicts with elephants to isolated problems at 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.

A grazing management project seeks to ensure sustainable use of rangeland and mitigate the effects of overgrazing. The conservancy has also attempted to address repeated illegal livestock incursions from neighbouring communal areas. The devil's 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 (CRIAA-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 directly integrated with the conservancy.



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

Conservancies
are full of opportunities...

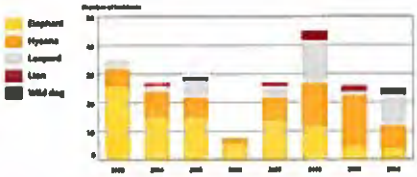
The wonderful mixture of environmental and cultural resources provides largely untapped potential in Nyae Nyae.

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 ever 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. Nonetheless, 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 unrealised tourism **opportunities** within Nyae Nyae, as well as the greater region. The mixture of the iconic 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 existence 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 **plans** 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 areas resources that can unlock the full potential. Tourism products could include well laid-out four-by-four routes with wilderness camping, serviced campsites near roads but away from larger settlements, luxury lodges and tented camps, high quality local guiding, birding and other special interest tours. Improvements to the current infrastructure in Khaudum, including the state of artificial waterholes, can facilitate the establishment of the Khaudum tourism route while maintaining the area's wilderness appeal. The development of tourism routes through Nyae Nyae and Khaudum into the Caprivi or Botswana 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 utilises traditional San hunting skills. The superb hunting potential of the vast area in conjunction with the San culture creates a unique and very valuable product. Zoning is especially important to maximise 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...

The production of this brochure was jointly funded by MCA Namibia, Norad and WWF

Norad

Copyright © NACSO 2012. All photos taken in Nyae Nyae and Khaudum Image Gallery, Text © Nyae Nyae Image Bylon Thompson, Charlie Allen Jarvis, Photog John Manuel Photog

Barry , Anna <anna_barry@fws.gov>

Mark Saulsbury PRT #83103C

1 message

Barry , Anna <anna_barry@fws.gov> Thu, May 24, 2018 at 2:57 PM
To: Mark Saulsbury (b) (6)

Dear Mr. Saulsbury,

The following is in response to your phone call earlier today and your e-mail message below.

In response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service is revising its procedure for assessing applications to import certain hunted species like African elephants. We are withdrawing our countrywide enhancement findings for a range of species across several countries. In their place, the Service intends to make findings for trophy imports on an application- by-application basis. The President has been very clear in the direction that his administration will go.

Please be aware that we continue to seek additional information directly from the relevant foreign Government Authorities to support our permit findings, therefore, all applications are under review.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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>
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>
> You may also contact me by phone ((b) (6) should you have any questions…

Thanks for your assistance…

Mark Saulsbury

Mark Saulsbury

- Senior Vice President

(b) (6)

Barry, Anna <anna_barry@fws.gov>

Mark Saulsbury PRT #83103C

3 messages

Barry, Anna <anna_barry@fws.gov> Thu, May 24, 2018 at 2:57 PM
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Thanks for your assistance…

Mark Saulsbury

Mark Saulsbury

- Senior Vice President

(b) (6)

[redacted]

Mark Saulsbury (b) (6) [redacted] > Fri, Aug 24, 2018 at 9:54 AM
To: "Barry, Anna" <anna_barry@fws.gov>
Cc: Mark Saulsbury (b) (6) [redacted] >

Anna,

Please provide an update on the status of my import permit (MA83103C-0) which was received by your office on March 23, 2018….

Please let me know if you have any questions…

Best Regards,

Mark Saulsbury

From: Barry, Anna [mailto:anna_barry@fws.gov]
Sent: Thursday, May 24, 2018 1:57 PM
To: Mark Saulsbury (b) (6) [redacted]
Subject: Mark Saulsbury PRT #83103C

[Quoted text hidden]
[Quoted text hidden]

Barry, Anna <anna_barry@fws.gov> Fri, Aug 24, 2018 at 10:55 AM
To: Mark Saulsbury (b) (6)

Dear Mr. Saulsbury,

Please be aware that all application both new and ones submitted for renewal, cannot be finalized until this review process has been finalized. Thus, applications for species like African elephants and African lions are all currently under review.

Sincerely,

Anna Barry
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[Quoted text hidden]

Barry, Anna <anna_barry@fws.gov>

Mark Saulsbury PRT #83103C

Barry, Anna <anna_barry@fws.gov> Fri, Oct 12, 2018 at 11:48 AM
To: Mark Saulsbury (b) (6) [redacted]

Dear Mr. Saulsbury,

These applications are still under review.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
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On Fri, Oct 12, 2018 at 10:14 AM, Mark Saulsbury (b) (6) [redacted] wrote:

> Anna,
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> Can you provide any further update on the status of my import permit (MA83103C-0) which was received by your office on March 23, 2018 ??
>
> Your assistance is greatly appreciated….
>
> Best Regards,
>
> Mark Saulsbury

From: Barry, Anna [mailto:anna_barry@fws.gov]
Sent: Friday, August 24, 2018 9:55 AM

To: Mark Saulsbury <(b) (6) >
Subject: Mark Saulsbury PRT #83103C

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Please let me know if you have any questions…

Best Regards,

Mark Saulsbury

From: Barry, Anna [mailto:anna_barry@fws.gov]
Sent: Thursday, May 24, 2018 1:57 PM
To: Mark Saulsbury (b) (6) >
Subject: Mark Saulsbury PRT #83103C

Dear Mr. Saulsbury,

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On Thu, May 24, 2018 at 12:09 PM, Mark Saulsbury <mark@saulsbury.com> wrote:

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> Thanks for your assistance…
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> Mark Saulsbury
>
> Mark Saulsbury
>
> - Senior Vice President
>
> [redacted]

Mark Saulsbury

- Senior Vice President

(b) (6)

[redacted]

Mark Saulsbury

- Senior Vice President

(b) (6)

[redacted]

Barry, Anna <anna_barry@fws.gov>

Mark Saulsbury PRT #83103C

1 message

Barry, Anna <anna_barry@fws.gov> Mon, Dec 3, 2018 at 11:23 AM
To: MCruz@coppersmith.com

Dear Ms. Cruz,

These applications are still under review.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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On Wed, Nov 28, 2018 at 12:03 PM <MCruz@coppersmith.com> wrote:

Anna/F&W Permits Division,

Can you provide any further update on the status of Mr. Saulsbury's import permit (MA83103C-0) which was received by your office on March 23, 2018 ?? Last email response was 4/09/18 with permit still under review. Your advise will be greatly appreciated.

Hunter: Mark Saulsbury
Direct (b) (6)
(b) (6)

Kind Regards,

Mirna Cruz
Import Analyst
mcruz@coppersmith.com
Tel: (281) 442-4800 - ext. 129
Fax: (281) 442-8892
15904 International Plaza Drive
Houston, TX 77032

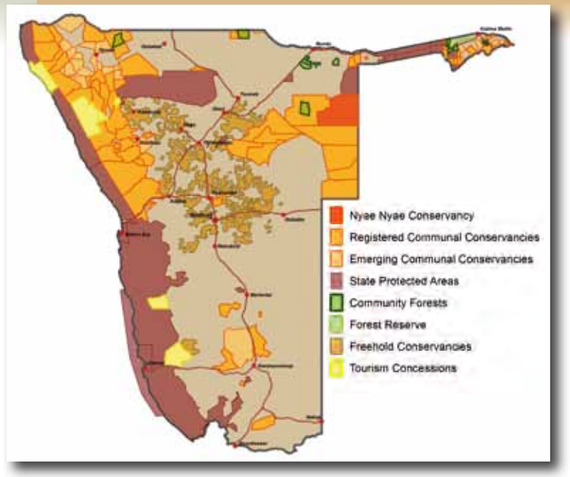
Coppersmith Global Logistics
Committed! Connected! Complete!

Living with wildlife –

the story of Nyae Nyae Conservancy

Nyae Nyae – Ju/'hoansi for 'the place without mountains, but rocky'

Living with wildlife – the story of NYAE NYAE CONSERVANCY



A CONSERVANCY IS...

- 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 elected 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
- zoned for multiple uses to minimise conflict and maximise the interests of all stakeholders

Conservancies
enable development and conservation over large areas...

MILESTONES AND SUCCESSES

1981 – an NGO that over time evolves into the Nyae Nyae Development Foundation of Namibia is formed to support the community
1994 – the Nyae Nyae community begins the process to register as a conservancy
1996 – policy changes allow communal area residents to benefit from wildlife and tourism by forming conservancies
1998 – Nyae Nyae Conservancy is registered in February, becoming the first communal conservancy in Namibia
1998 – the Nyae Nyae Conservancy office is established at Barakka
99-05 – each year, wildlife is re-introduced into the conservancy, including springbok, red hartebeest, gemsbok, eland, kudu and blue wildebeest, with a total of 2,200 animals being introduced
2001 – an annual game count is started in Nyae Nyae
2002 – the Event Book monitoring system is implemented in Nyae Nyae
2003 – the conservancy office is moved to Tsumkwe
04/05 – a large game-proof camp is erected to manage the remaining Nyae Nyae buffalo population and avoid contact with livestock
2005 – the Nyae Nyae Trust is formed
2008 – black rhino are re-introduced into the conservancy
2008 – an application is lodged with the Ministry of Environment & Tourism to extend the borders of the conservancy to include the village of N'homa
2011 – an application is lodged with the Ministry of Agriculture to register Nyae Nyae Community Forest, having the same borders and management structures as the conservancy

QUICK FACTS

Region: Otjozondjupa
Approximate population: 2,300
Date of registration: February 1998
Size: 8,992 square kilometres
Main language: Ju/'hoansi

NYAE NYAE offers an enchanting mix of

interesting cultures and dynamic communities committed to sustainability – people living in Nyae Nyae share a common vision for managing their area and its resources

vast, diverse and spectacular landscapes – Nyae Nyae Pans, bushland, magical baobabs... a healthy environment diversifies economic opportunities and drives economic growth

charismatic, free-roaming wildlife – elephant, lion, leopard, wild dog, diverse plains game, abundant birdlife... wildlife generates a variety of benefits for local people

people are living with wildlife, are managing natural resources wisely and are reaping the benefits...

A LITTLE HISTORY

Prior to Namibia's independence in 1990, 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 community safety. Ground-breaking legislation passed in the mid-nineties laid the foundation for a new approach to the sustainable use of natural resources. By forming a conservancy, people in communal areas can now actively manage – and generate benefits from – wildlife and other resources in their area, encouraging wildlife recoveries and environmental restoration. While a conservancy is a natural resource management structure, it is defined by social ties. Conservancies unite groups of people with the common goal of managing their resources. Today, over 60 communal conservancies embrace one in four rural Namibians, underlining a national commitment to both rural development and conservation.

Nyae Nyae is the oldest, as well as the second largest conservancy in the country, covering close to 9,000 square kilometres. Most of the 2,300 residents are from the Ju/'hoansi ethnic group, a sub-group of the San. Historically, the Nyae Nyae area occupied by the Ju/'hoansi stretched into Botswana in the east, north beyond what is today Khaudum National Park, south to the settlements of Eiseb and Gam and west beyond the settlement of Aasvoëlnes. Today, Botswana creates the eastern border of the conservancy, while to the south, west and north, Ondjou and N≠a-Jaqna Conservancies and Khaudum National Park adjoin Nyae Nyae, and in turn border onto other conservancies to form a huge contiguous conservation landscape.

The long process to mobilise, unite and support the Nyae Nyae community in forming a conservancy in a sense already began prior to Namibia's independence. In 1981, what is today the Nyae Nyae Development Foundation was formed to support the community in development and resource management. By the time the conservancy legislation was passed in 1996, the Nyae Nyae community was well placed to register the conservancy, which was gazetted in early 1998.

San or Bushman? *Both terms have a slightly derogatory origin. Bushman originates from the Dutch word bosjeman - an outcast who lives in the bush. San comes from the Nama 'saa', referring to poor people without cattle. While the Regional San Conference of 1993 adopted San as the official term, Bushman has also lost much of its negative connotation and today is taken to refer more to the great environmental knowledge and bush skills of the San.*

RESOURCES AND ATTRACTIONS

Conservancies
are living landscapes...

The culture of the San is legendary, an often idealised icon of a balanced existence within the natural environment. The San have superb 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 archeological artefacts and recent finds indicate a presence of people from the Middle Stone Age. It seems likely that the ancestors of the Ju/'hoansi have roamed across 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 Komtsa Daqm, a museum guide.

The vast, mostly unfenced Nyae Nyae environment retains a strong wilderness atmosphere, which is enhanced by the fascination 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 seasonal surface water in the so called 'pannetjiesveld' (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.

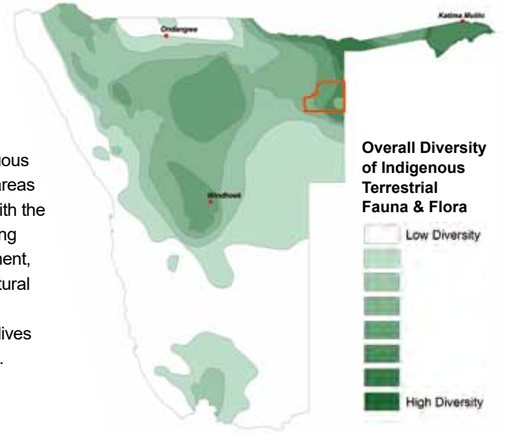
Huge baobabs punctuate the savanna woodland and create a sense of ancient Africa. Rainfall in Nyae Nyae is low and unpredictable, with an annual average of around 450 millimetres. The harshness of the environment is increased by high temperatures and extremely high evaporation. However, the water table 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 Otjozondjupa Region.

a seemingly endless world of bushland and pannetjiesveld, 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 hyaena 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 giraffe, eland, kudu, blue wildebeest, roan, gemsbok, hartebeest, springbok, duiker, steenbok, warthog, spotted and brown hyaena, cheetah and jackal. More than 200 bird species have been recorded in the conservancy. Birding 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 snipes, flamingos, wattled cranes and breeding slaty 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 manketti, leadwood, terminalia, false mopane and a variety of acacia trees, as well as devil's claw and Kalahari melon.

Around Nyae Nyae... The nearby Khaudum National Park is known especially for its numbers of elephant and roan, as well as for its wilderness flair. Both Nyae Nyae and Khaudum 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.



LIVELIHOODS AND DEVELOPMENT

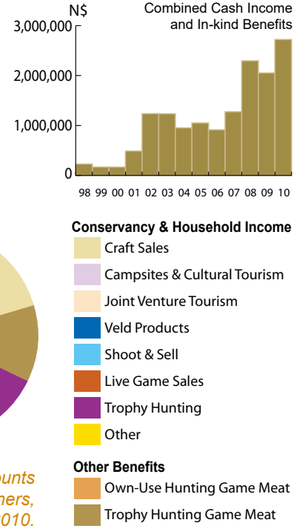
Conservancies empower rural people...

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 to land. The literacy rate is low at around 20%, with school attendance at only half the national average. The few opportunities for formal employment are thus further 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 the six San traditional authorities who have received official recognition. All this is the result of many years of marginalisation.

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

A variety of development initiatives by both government and non-government organisations over the last 30 years have attempted to move the San into modern society. Schools and health facilities have been developed, permanent water points have been established and livestock herding and gardening 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 *n!ore* with exclusive resource use rights. Around 40 settlements are spread throughout the conservancy.

Tsumkwe, originally a *n!ore* water source, was established as the administrative centre of the area in 1959. An area of 30 square kilometres around Tsumkwe is excluded 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 hospitals lie outside the conservancy at Mangetti Dune and Grootfontein. There are five primary schools in Nyae Nyae and Ju/'hoan speakers participating in the Village School Programme have access to schooling in their mother tongue.



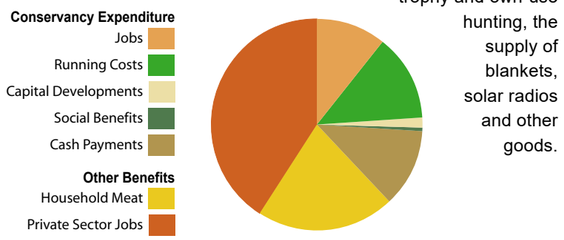
Benefits to the conservancy and its members come from a variety of sources. Sources and amounts vary from year to year, depending on factors such as agreements with private sector partners, and market fluctuations. The pie chart shows the main benefit sources in 2010.

Harvesting of devil's claw for the health industry is practiced widely, providing income to around 300 to 400 harvesters. Craft production has become an important source of income for both men and women, with over 300 craft producers in the conservancy. While the men concentrate on producing traditional implements such as bows and arrows, women create exquisite ostrich egg shell jewellery and other beautiful items. The G!hunku Crafts shop, located next to the conservancy office, is a superb local outlet for these crafts.

The C44 gravel road provides access for visitors to the area, connecting Tsumkwe with the B8 tar road between Grootfontein and Rundu in the west, as well as the Dobe border post leading to Botswana in the east. Four wheel drive is needed beyond the gravel road, both within Nyae Nyae and to access Khaudum, or when proceeding into Botswana.

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. Veld 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 distributes individual benefits each year, including annual cash payments, meat from trophy and own-use 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 museums at Mountain Pos and Dou Pos, with income going directly to the villages. Another excellent cultural experience, the Living Hunter's Museum, is located at //Xa/oba village along the track to Khaudum and includes a campsite. Wilderness campsites are also located at Makuri, Djxokwe and Kremetartkop and, although underutilised, 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 teams 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 and benefit areas in 2010.

Conservancies facilitate sustainability...

Nyae Nyae is divided into four areas for management purposes. The management structure includes 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 CBNRM field officer, three water team staff, a craft trainer, a craft shop coordinator (funded through shop income), a devil's 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 decide on benefit 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 Tsumkwe and integrates G!hunku Crafts. 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 Nyae Nyae Development Foundation.

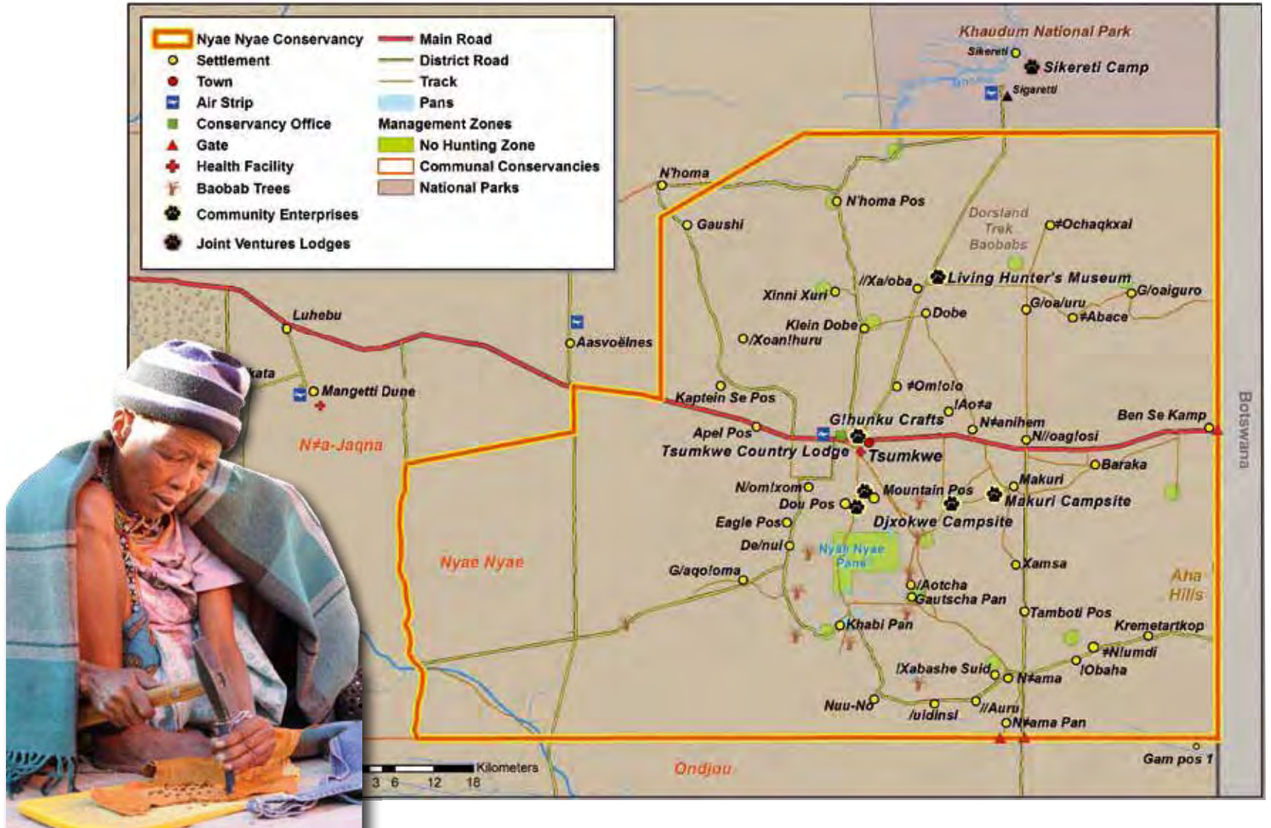
the Nyae Nyae Conservancy provides vital structures for managing the communal natural resources of the area in a way that enhances development and ensures sustainability

Activities... The conservancy is based on the traditional Ju/'hoansi *n!ore* land management system, which was recognised by government in 1991. Members have the right to hunt approved game within their *n!ore* on foot with bow and arrows, spears or bird traps. Hunting is reported to the *n!ore* 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' at waterholes 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 Nyae Nyae Development Foundation and other NGOs, the conservancy has developed 'elephant proof' water reservoirs for villages, which has reduced conflicts with elephants to isolated problems at 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 repeated illegal livestock incursions from neighbouring communal areas. The devil's 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 (CRIAA-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 directly integrated with the conservancy.



CHALLENGES, OPPORTUNITIES...

Conservancies
are full of opportunities...

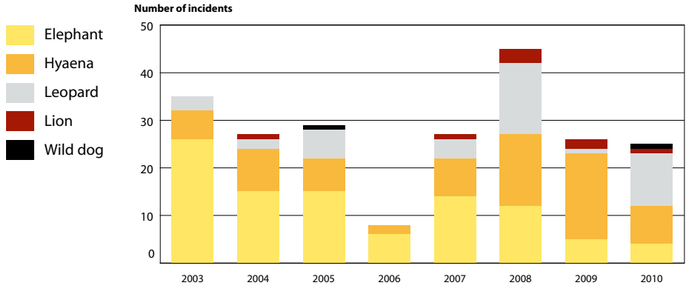
The wonderful mixture of environmental and cultural resources provides largely untapped potential in Nyae Nyae.

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 ever 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. Nonetheless, 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 unrealised tourism opportunities within Nyae Nyae, as well as the greater region. The mixture of the iconic San culture and authentic wilderness experiences provides various development options. Interpretation through qualified guiding and excellent information materials can make the complexity of modern San existence 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.

... AND THE FUTURE

four-by-four routes with wilderness camping, serviced campsites near roads but away from larger settlements, luxury lodges and tented camps, high quality local guiding, birding and other special interest tours. Improvements to the current infrastructure in Khaudum, including the state of artificial waterholes, can facilitate the establishment of the Khaudum tourism route while maintaining the area's wilderness appeal. The development of tourism routes through Nyae Nyae and Khaudum into the Caprivi or Botswana can help the area become one of Namibia's primary wilderness tourism destinations.

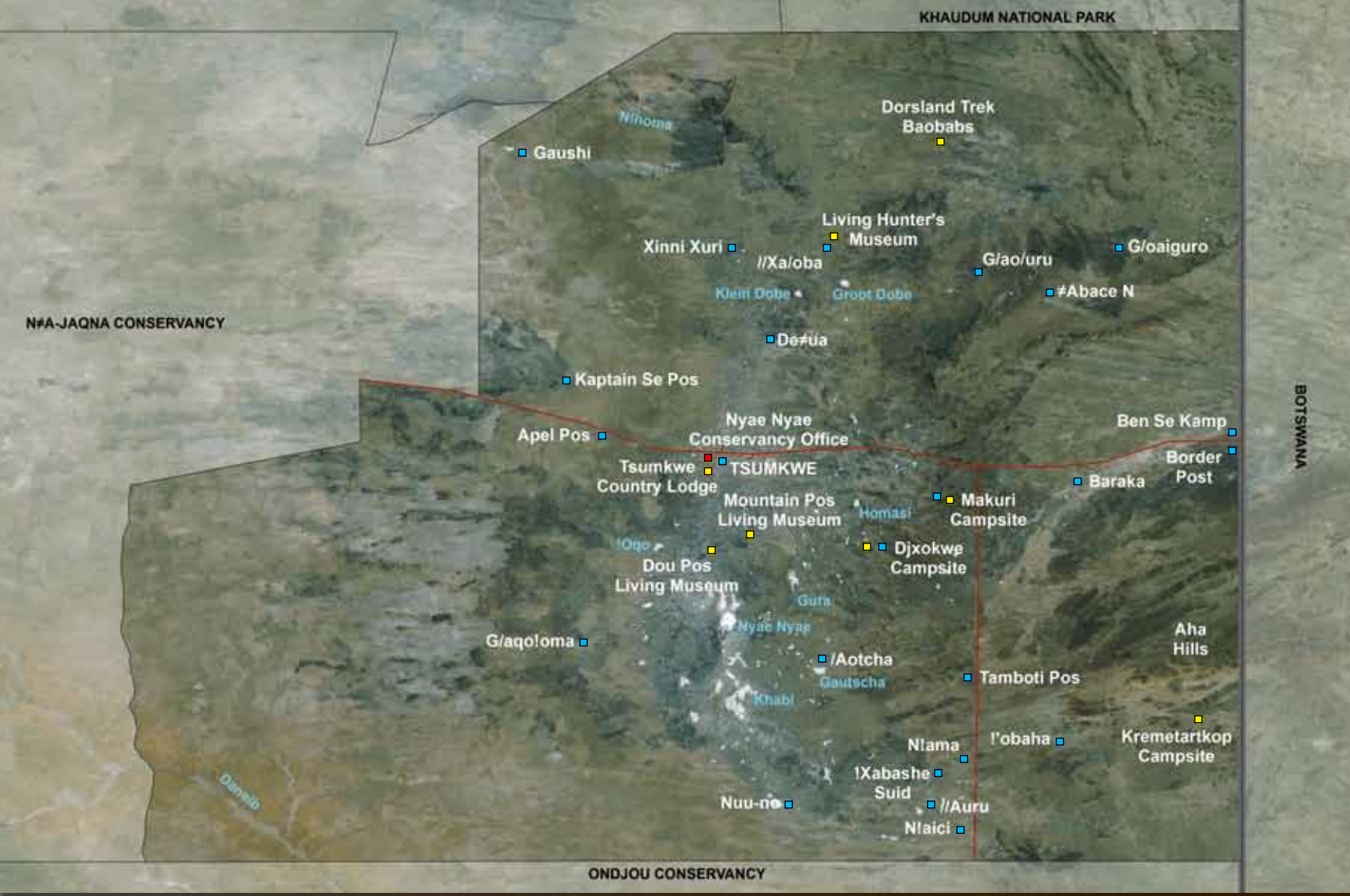
Hunting forms an integral part of the San culture. Trophy hunting can play a vital role, providing significant income to the conservancy through concession fees, as well as creating employment that utilises traditional San hunting skills. The superb hunting potential of the vast area in conjunction with the San culture creates a unique and very valuable product. Zoning is especially important to maximise the potential of tourism and hunting products and strengthen core wildlife areas and tourism sites.

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 plans 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 areas resources that can unlock the full potential. Tourism products could include well laid-out

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...



The production of this brochure was jointly funded by MCA-Namibia, Norad and WWF

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Maps: Sylvia Thompson; Charts: Alice Jarvis; Printing: John Meinert Printing

For more information and updates:
Nyae Nyae Conservancy
P.O. Box 45
Grootfontein
Telephone: +264 (0)67 244011

www.namibiawildlifesafaris.com | www.nacso.org.na

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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June 13, 2019

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

RE: Supplement to PRT No. 83103C, Saulsbury, Mark Application for Elephant Trophy

Dear Chief Cogliano:

This supplement is in support of Mark Saulsbury's application to import an African Elephant Trophy harvested from the Nyae Nyae Conservancy in Namibia in 2018. The Nyae Nyae Conservancy is Namibia's oldest conservancy and recently received an award for their outstanding efforts in wildlife conservation and game management from the International Council for Game and Wildlife Conservation (CIC).

In 1970 the Nyae Nyae Conservancy had no elephants and now there is an estimated 1500 to 2000. Through sustainable hunting and active rural stakeholders in the Conservancy, it can be said that tourism hunting and the quota system that is monitored by the Ministry of Environment and Tourism of Namibia is working.

Please find enclosed an article titled, "Nyae Nyae wins Conservation Award" *The Namibian* (Author: Steve Felton, May 10, 2019), published in Namibia's largest daily newspaper and the article from the CIC website.

Sincerely,

John J. Jackson III

Encl: Article, "Nyae Nyae wins Conservation Award", *The Namibian*, May 10, 2019
Article, "Edmond Blanc Prize awarded to the Nyae Nyae Conservancy and stakeholders", 10/5/ 2019

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Nyae Nyae wins conservation award

News - Environment | 2019-05-09

Page no: 8

NEXT TO GODLINESS … Ignatious Jingura sorts out discarded obsolete electronic gadgets at the electronic waste management company in Windhoek. He said in line with the launch of this year's national clean up campaign by environment minister Pohamba Shifeta in April which is scheduled for September, as well as the recent Windhoek municipality's recent clean-up campaign, people should always ensure they get rid of waste from their environment everyday. Photo: Contributed.

STEVE FELTON

NAMIBIA'S oldest conservancy, Nyae Nyae, was awarded the prestigious Edmond Blanc prize at an event held at the Safari Court Hotel in Windhoek on Saturday.

The International Council for Game and Wildlife Conservation (CIC) awards the prize for outstanding efforts in wildlife conservation and game management.

In the words of the CIC: "Only those game reserves, and game organisations that have had outstanding success in their work to conserve [the] natural environment, to protect free-roaming animals in the wild and to manage game according to principles of sustainability shall be eligible for the Edmond Blanc prize."

The prize was awarded to Nyae Nyae Conservancy and stakeholders, including professional hunter Stephan Jacobs of SMJ Safaris and the Ministry of Environment and Tourism.

It was presented to chief Tsamkxao ≠Oma, who explained traditional hunting methods to the modern trophy hunters gathered from around the world.

"We hunt without noise," he said. "In the past we would track an animal and then stay with it until the meat was finished. But this would chase other animals away, because of our smell."

Wishing to conserve and keep wildlife in the conservancy, the chief said they have created large hunting areas, away from the villages, to sustain wildlife for generations to come.

Referring to the changes since the conservancy was formed in 1998, the chief said that hunting is now done according to quotas set by the Ministry of Environment and Tourism based upon game counts.

Traditionally the San people only hunted what they needed to eat, said Tsamkxao ≠Oma, and the quota system also ensures that game is conserved.

In motivating the prize for Nyae Nyae, Rolf Baldus, a German economist who has published widely on conservation issues, said Nyae Nyae, located in the so-called Bushmanland in the north-east of Namibia, covers an area of approximately 900 000 hectares of wilderness, which is rarely found in Africa today.

"Sustainable hunting is one way to conserve and carefully develop [San] culture," writes Baldus. "It promotes wildlife conservation with clear measurable results through sustainable use of wildlife," and: "Through community involvement … it has combated wildlife crime and continues to do so."

Poaching in the area is at a very low level.

Stephan Jacobs is the current professional hunter contracted by Nyae Nyae conservancy.

In a brief history of conservation hunting in Nyae Nyae, he stated that in 1970 there were no elephants in the area. They first migrated from the Zambezi area in 1971, and when the legendary hunter Volker Grellmann obtained the first hunting concession in the area, there were 80-100 bull elephants in Nyae Nyae.

Today there are between 1 500 and 2 000 elephants in the conservancy, according to Jacobs.

The hunter went on to state that conservation hunting actively conserves wildlife, and that plains game and lion numbers have increased dramatically in Nyae Nyae.

Modern hunting of game, including buffalo and a quota of nine elephants in 2019, is done with rifles, but tracking is still done on foot using the skills of San trackers who cover up to 30 kilometres a day.

Employment of trackers is one of the benefits of conservation hunting. Others include the employment of conservancy rangers and cash benefits to what was one of the poorest communities in Namibia, said Jacobs.

Almost all of the N$2 million paid out to conservancy members in each of the last two years comes from conservation hunting, which

also pays for water holes for game.

Meat for the community is also a vital benefit of sustainable hunting for a poor community, he said, with 30 tonnes being distributed.

Namibia, in its presentation to the CITES convention later this year, will argue that the sustainable use of wildlife brings financial and social benefits to rural communities and conservation benefits to wildlife.

In motivating the Edmond Blanc prize, Dr Baldus stated that Nyae Nyae "has followed strictly all Cites rules and fulfils fully the expectations of Cites that hunting protected species contributes to their conservation."

15 May 2019
Edmond Blanc Prize, General Assemblies, Latest News

Edmond Blanc Prize Awarded to the Nyae Nyae Conservancy and Stakeholders 10 May 2019

The Edmond Blanc Prize awards outstanding efforts in wildlife conservation and game management that are based on the principles of

CIC VIDEO CHANNEL

Social media – Friend or Enemy of Conservation'
15 May 2019

How hunting saves wildlife – Second part
15 May 2019

World Migratory Bird Day 2019
11 May 2019

Hungary joins the 1 Euro per Hunter Initiative
5 May 2019

Opening Ceremony – Crossroads – Leading the Way for

sustainable wildlife use. The International Council for Game and Wildlife Conservation (CIC) has been awarding game reserves, conservation associations and organizations since 1928, choosing one area every second year, honoring those that have had outstanding success in their work to conserve the natural environment, to protect free-roaming animals in the wild and to manage game according to principles of sustainability. During the closing ceremony of this year's 66th General Assembly, Namibia, the Edmond Blanc Prize was given to the Nyae Nyae Conservancy and Stakeholders, and was awarded to Stephan Jacobs for their work as professional hunters within the conservancy. A short dance was performed on stage to commemorate the occasion, which was followed by Chief Tsamkxao ≠Oma of the Nyae Nyae conservancy giving his thoughts as the Chief Bobo. He spoke of the changes since the creation of the conservancy, with particular mentions to the use of designated areas specifically for the purposes of hunting. Nyae Nyae's dedication to the use of modern hunting practices, and their adoption of hunting regulations and quotas, was also highlighted.

TWEETS

Tweets by @CICwildlife

CIC
@CICwildlife

#photoprize The theme of the 2019 photo prize is "Wildlife up close". Deadline: 28 February 2019. Applications to photo@cic-wildlife.org

Jan 22, 2019

CIC
@CICwildlife

This year's #MarkhorAward winner is the 'Return of Rural Wetlands LIFE+ Project'! Congratulations! #conservation #wildlife

Embed View on Twitter

FACEBOOK

Stephan Jacobs then took the stage to give a statement on his experience as a professional hunter at the Nyae Nyae conservancy. He opened by stating the huge difference in elephant numbers, as well as lions and plains game, since the introduction of the conservancy in 1998; elephant numbers were estimated to be between 80-100 in 1978, with the current elephant population numbering between 1500 and 2000. Supplying water to these elephants was noted as one of their most significant achievements, with the average elephant bull consuming 250l of water a day.

The contributions of trophy hunting and what is has achieved for Nyae Nyae were emphasized, which includes providing 85% of the conservancy's income, funding a number projects including a cash benefit (in 2017/18 more than 2 million Namibian dollars was given to conservancy members as cash benefits). Meat distribution, totaling more than 50 tonnes of meat per year, and job opportunities were regarded as additional benefits.

Mr. Jacobs also stressed the importance of the Sun people, who provide knowledge of traditional hunting techniques (such as tracking) and how to coexist with wildlife when living amongst them. He gave an overview of a typical day in his life as a professional hunter, which includes tracking and identifying elephants that are suitable to be hunted – on average they look through 80-100 elephant bulls before finding one sufficient in size, age and other characteristics.

Achievements of the Nyae Nyae Conservancy

Nyae Nyae was considered for this prize on the basis of their outstanding achievements in conservation, fulfilling multiple criteria set out by the CIC. Their work in the sustainable use of wildlife has yielded clear and measurable results through an increase in the number of wildlife, particularly in the restoration of elephant numbers in the conservancy. Aggregating data from aerial surveys, moonlight waterhole and foot transect counts, it was found that elephant numbers have increased at an average rate of 3.0% per year between 1998 and 2015. Much of this is due to the work that Stephan and his team have done in the creation of new boreholes that provide water to elephants – water can be considered a limiting factor to elephant population growth in this arid area.

Their approach to community involvement in conservation was also commended. The model, which incorporates ideas of community based natural resource management, shifted the majority of revenues to the local San people. Nyae Nyae's community led approach gave local

community members a reason to care about wildlife, and provided the San people with employment opportunities. Stephen works closely with the San on hunts, making good use of their tracking abilities. In addition, the San's involvement in anti-poaching measures has led to the control of general poaching within the conservancy.

Their dedication to conducting responsible hunting was recognized as a further achievement by the CIC. Nyae Nyae has consistently elected professional hunters, acting as lease-holders for a five year period in the conservancy, that have shown their ability to successfully manage the conservational and socio-economic responsibilities associated with the role. In regards to their methodology when it comes to hunting, much care goes into choosing animals with the suitable characteristics. For the case of elephants, only older, post-productive elephant bulls are selected for this purpose. The hunting results of recent years are also impressive; the average weights of the tusks of all trophies were consistently well over 70 lbs with a positive, upwards trend – this is unmatched in Africa today.

The CIC would like to congratulate Mr and Mrs. Jacobs, as well as the Nyae Nyae Conservancy and stakeholders, on this achievement and we hope that their work can inspire others in the

sustainable wildlife use community to work towards even greater successes going forward.

LEAVE A REPLY

Your email address will not be published. Required fields are marked *

Name*

Email*

September 5, 2019

VIA CERTIFIED MAIL AND EMAIL

LB

David Bernhardt, Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240
exsec@ios.doi.gov

Margaret Everson, Principal Deputy
Director,
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington DC 20240
margaret_everson@fws.gov

Daniel Jorjani, Esquire, Acting Solicitor
Principal Deputy Solicitor
Department of the Interior
1849 C Street, S.W.
Washington, DC 20240
daniel.jorjani@sol.doi.gov

Karen Budd-Falen, Esquire
Deputy Solicitor for Parks and Wildlife
Department of the Interior
1849 C Street, S.W.
Washington, DC 20240
karen.budd-falen@sol.doi.gov

Eric Alvarez
Acting Assistant Director for International Affairs
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington DC 20240
Aeric_alvarez@fws.gov

Director,
Division of International Conservation
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dr. Mary Cogliano, Chief Branch of Permits,
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
mary_cogliano@fws.gov

Re: 60 day notice of intent to sue for failure and refusal to process elephant trophy import permit applications.

Dear Ladies and Gentlemen:

This is a 60-day Notice of Intent to Sue under the Endangered Species Act, 16 U.S.C. Sec. 1531 et seq. ("ESA"), for failure and refusal to process elephant trophy import permit applications in violation of the Administrative Procedures Act, 5 U.S.C Sec. 553 et seq. ("APA"), the Rules and Regulations of the Department implementing the ESA, *see* 50 CFR Part 17, the Special ESA Elephant Regulations, 50 CFR 17.40, regulations implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora, Mar. 3, 1973, 27 U.S.T. 1087 (hereinafter "CITES"), *see* 50 CFR Part 23, and the general permitting regulations of the United States Fish and Wildlife Service ("USF&WS" or "Service"), *see* 50 CFR Part 13.

This notice is on behalf of Dallas Safari Club ("DSC"), their members who desire to engage in trophy sport hunting of African elephants, outstanding elephant trophy import applicants, DSC conservation partners, including Sango Safaris, the Namibia Ministry of Environment and Tourism, the Namibian Association of CBNRM Support Organisations ("NASCO"), and the individual permit applicants set forth on Attachment A to this letter.

The African elephant (*Loxodonta africana*) is listed as threatened under the ESA and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(e)]. The 4(d) special rule lists the requirements for the import of sport-hunted trophies. Under paragraph 17.40(e)(6)(i)(B), for the USF&WS to issue a threatened species permit under 50 CFR 17.32, authorizing the import of a sport-hunted elephant trophy, the Service must make a determination that the killing of the trophy animal will enhance the survival of the species.

Pursuant to the APA, the Service is required to process these permit applications and make a decision on them within a reasonable time. 5 USC 558(c). 50 CFR 13.11 provides

that permit applications will be processed "as soon as possible." And 5 USC 706 provides for judicial review of "agency action unlawfully withheld or unreasonably delayed." Moreover, the delay is denial without appeal in violation of 50 CFR 13.29 or judicial review, *see* APA section 706. The delay also conflicts with the duty the Service has under the ESA to recover the listed species and the enhancement that the permitting would encourage, thus violating 16 U.S.C. 1533(f) and 16 U.S.C. 1540.

A "hold" has been put on the processing of all elephant trophy import permit applications since November 2017 after President Trump issued two "tweets" on 17 and 19 November 2017 on his Twitter account @realDonaldTrump. The effect of this hold following the President's tweets has been to injure conservation efforts designed to protect the African elephant. This hold is further injurious to the people of the countries the elephants inhabit as the local population benefits from controlled sport hunting of elephants, a fact the Service has previously acknowledged.

Although positive enhancement determinations for Zambia and Zimbabwe were made immediately before the "hold" in November 2017, Namibia and the Republic of South Africa enhancement findings were neither new nor disputed. The positive enhancement determination for Zambia had not been suspended. By any standard, the countries of Botswana, Namibia, South Africa, Tanzania, Zambia and Zimbabwe have done nothing to deserve this mistreatment, and breach of treaty, law and regulations. A "tweet" is not a proper rule making. Moreover, this hold has been extended to all elephant trophy imports including from countries where the Service had longstanding positive enhancement findings that were the "gold" standard.

Subsequently, on March 1, 2018[1], the Service issued a memorandum in response to the D.C. Circuit Court's opinion in *Safari Club Intl., v. Zinke*, 878 F.3d 316 (D.C. Cir., 2017) which withdrew enhancement findings, including the enhancement findings for Zambia and Zimbabwe, and stated that

> All of the above referenced findings are no longer effective for making individual permit determinations for imports of those sport-hunted ESA-listed species. However, the Service intends to use the information cited in these findings and contained in its files as appropriate, in addition to the information it receives and has available when it receives each application, to evaluate individual permit applications. The Service is continuing to monitor the status and management of these species in their range countries. At this time, when the Service processes these permit applications, the Service intends to do so on an individual basis, including making ESA enhancement determinations, and CITES non-detriment determinations when required, for each application. The Service intends to grant or deny permits to import a sport-hunted trophy on a case-by-case basis pursuant to its authorities under the ESA and CITES.

[1] https://www.fws.gov/international/pdf/memo-withdrawal-of-certain-findings-ESA-listed-species-sport-hunted-trophies.pdf

> As part of the permitting process, the Service reviews each application received for import of such trophies and evaluates the information provided in the application as well as other information available to the Service as to the status of and management program for the species or population to ensure that the program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized.

This determination was not made as the result of the rule making proceeding ordered by the court in *Safari Club Intl. v. Zinke,* and would appear directly inconsistent with the court's opinion. Nonetheless, despite the statements contained in the Service's March 1, 2018, memorandum, all elephant import permits have remained on "hold." This is true for pre-act elephant trophies and renewal applications for elephant trophy import permits predating the "hold." The Service is not processing elephant import permits on a case by case basis or on any basis whatsoever. This lack of action is contrary to the law and applicable regulations.

The Service is unlawfully employing the "hold" on elephant trophy import permitting to elephant trophy imports from all countries, and even to the simple renewal of elephant import permits and to pre-act elephant trophies. The "hold" has been applied unlawfully to the detriment of the very best and most successful elephant management programs in Africa. The broadly applied "hold "was not a duly noticed and made rule making, was arbitrary, capricious and irrational, and greatly threatens the elephant and range nation programs the ESA and CITES aim to encourage and enhance. Indeed, the "hold" jeopardizes and obstructs years of conservation activities in Southern and a substantial part of Eastern Africa.

Tanzania, Zambia, Zimbabwe, Mozambique, Botswana, Namibia and South Africa hold an estimated 340,000 elephants out of a continental total of 415,000, i.e. 82 per cent of the elephants of Africa. The conservation success of these countries is linked to policies incorporating sustainable use of natural resources, based on science and aiming at improving livelihoods of rural communities while maintaining vast tracts of unspoiled habitat and ecosystems.

The tolerance by the rural citizens of Southern and Eastern Africa of elephants is increased through hunting revenue sharing systems in place throughout the region. The presence of substantial herds of elephants risk serious devastation of the crops on which the rural African population depend. Without the revenue generated by sport trophy hunting, the population would view the elephant more as pests than as a natural resource. Moreover, overpopulation of elephant threatens the habitat of other threatened species. *See* Statement of Sango Safaris, Attachment B.

The "hold' obstructs 70 per cent of the revenue of the Community Conservancy Program in Namibia. All tourist safari hunting of elephant occurs in community

conservancy areas. Likewise the hold obstructs the same percentage of the revenue of the 700,000 families which depend on the CAMPFIRE Program in Zimbabwe. The "hold" undermines the community Wildlife Management Areas in Tanzania that are intended to provide incentivizing livelihoods to rural communities and to act as corridors for elephant and other species between protected areas. The "hold" obstructs the community program in Zambia which largely relies upon tourist safari elephant hunting. The "hold" largely blocks the developing elephant conservation strategy in Botswana that recently has lifted the suspension of tourist safari hunting. Tourist safari elephant hunting had previously been 70 per cent of community revenue in that country.

Therefore, the "hold" is jeopardizing conservation efforts in these countries and threatens the livelihood of more than one million persons and the biodiversity of millions of hectares of pristine wilderness. Without the management and revenues from tourism hunting, these lands are being encroached and converted to agro-pastoral land, leading to the unavoidable extinction of wildlife and natural habitats, and the collapse of ecosystem services.

The successful elephant conservation as well as the control of poaching largely depend upon the sustainable use conservation strategy in the form of elephant tourist safari hunting in each of these countries. The elephant populations and programs in these countries cannot be sustained without the revenue generated by safari hunting and U.S. import of the trophies; hence the "hold" is *the* major threat to the survival of the largest remaining elephant populations in Africa. Hundreds of thousands of elephants are in jeopardy and more than a million families are being deprived of the realization of their single most valuable natural resource because of this illegal "hold."

Finally, tourist safari hunting of elephant is governed by sound administrative systems in all countries that include scientific based quotas supported by CITES non-detriment findings, law enforcement largely funded or carried out by safari hunting operators on the largest share of wild habitat, regulatory permitting, and community-based conservation programs, most of which was supported by over one-hundred million dollars of USAID funding because of its conservation and humanitarian merit.

In conclusion, on behalf of DSC, its members, outstanding elephant trophy import applicants, and DSC conservation partners, and for the reasons stated in this notification, we intend to sue under the Endangered Species Act for failure and refusal to process elephant trophy import permit applications.

Respectfully,

Scott Tobermann
DSC President

13709 Gamma Road, Dallas, TX 75244 * (972) 980-9800 * Fax (972) 980-9925
E-Mail: info@biggame.org * Webpage: www.biggame.org

INDIVIDUALS WITH PERMIT APPLICATIONS PENDING

ATTACHMENT A

PRT #	Last Name	First Name	Area	Date of Hunt	Date of Application
93406C	Evans	Milton Karl	Zimbabwe, Dande North Hunting Concession	5/17-5/30/2018	5/10/2018
84788C	Reeves	Steve	Zimmbabwe, Semore 1 +2 , TTL Campire Ares	April 13-24, 2018	3/7/2018
MA18507C-0	Rogers	Anthony	Zimbabwe, Matabeland South	7/29-8/16, 2017	1/11/2017
MA33591C	Cheek III	Atlas	Zimbabwe, Chewore North Safari Area	7/28/2014	4/18/2017
US58155C	Crippen	Daniel	Zimbabwe, Matetsi Safari Area, Unit 5, Victoria Falls	8/11/2017	9/25/2017
MA57769C-0	Crippen	David	Zimbabwe, Matetsi Safari Area, Unit 5, Victoria Falls	8/20/2017	9/25/2017
033669C/9	Hanson	Arlene & Bob	Zimbabwe, Tsholotsho	9/1/2016 to 9/15/2016	
MA48117D	Weaver	John	Namibia, Zambezi (Caprivi) Region		6/28/2019
83103C	Saulsbury	Mark	Namibia, Nyae-Nyae Conservancy	8/8/2017	3/5/2018
85343C	Ottmers	Bryan	Zimbabwe, Save Valley Conservancy	8/1/2015 to 8/14/2015	3/19/2018
	Pirkle	Mark	Namibia, Shamakuve Concession	9/14/2019 to 10/14/2019	6/20/2019
MA06118C	Easter	Joe (Lane)	Zimbabwe		

Attachment B

STATEMENT OF SANGO SAFARIS OF SAVE VALLEY SAFARIS, ZIMBABWE

Sango Safaris represents a 60,000 hectare property, situated within the Save Valley Conservancy ("SVC") in the South Eastern Lowveld of Zimbabwe.

The annual 2018 aerial survey, carried out every September/October for the past 20 some years showed a population of 665 elephant on Sango last year. As an average in recent years we have from 600 to over 900 elephants on Sango at any given moment. Our ecologically established carrying capacity ranges between 200 to 300 elephants. Therefore, we have at any given moment between 400 to 700 too many elephants on Sango with devastating destruction not only to the food base of the species causing the destruction but with dire consequences for all other plains game animals.

For example the Elephants' destruction as well as decreasing rains have resulted in our zebra and wildebeest herds dropping from 1,500 to 2,000 to around 600 of each species today. Similar numbers are experienced for all other grazers. Aerial Survey numbers for elephants on Sango since 2009 are as follows:

No. Elephants	Year
654	2009
462	2010
393	2012
648	2013
474	2014
497	2015
949	2016
684	2017
665	2018

The latter shows a current density of 1.1 elephant per square kilometer, whilst the recommended density is 0.2-0.3 per square kilometer for the dry Savanna areas we occupy.

The continued high density of elephant has and is having a very negative affect on Sango's habitats. For example the baobab trees of which we have an abundance are often hundreds if not thousands of years old. Approximately 90 per cent of all of our baobab trees are now suffering damaged by elephants. If this remains unaddressed Sango will have lost all its baobab trees in a matter of a few years.

Sango practices "sustainable utilization" and is proactive in the use of its excess animals, which income funds our further conservation efforts. To this end, Sango moved 100 live elephants to reduce their numbers and to help restock the Zimbabwe National Parks area in 2018. Such translocation solutions do not exist regularly as most national parks and private conservancies within a survivable translocation distance from Sango are overstocked with elephants as well.

The annual elephant hunting quota amounts to three older bulls for Sango and seven in total for the SVC. All funds generated from hunting flow fully towards running, protecting and maintaining the property and specifically its wildlife assets and the underlying habitats. This includes employment for 135 local people (44 of whom are anti-poaching scouts) provision of water for wildlife, fire breaks, road and infrastructure maintenance and a full time ecologist.

Sango forms the largest single property within the SVC. The most recent SVC elephant numbers are from a 2017 Aerial survey, (2,390 km2 of operating properties) and showed that SVC was home to 2038 elephants. This is an average of 0.85 elephant per km2 when the recommended density is 0,2-0,3 Km2. As per above formula this implies that we have approximately 1,500 elephants too many. However, we believe that the total elephant population in the SVC amounts presently to some 2,500 animals.

Elephant safaris bring in between $60 - 70,000 for each elephant. WWF recommends a trophy hunting quota of 0.75 per cent of an elephant population whilst we are not even hunting half of that quota. So the SVC and its members are prejudiced of a potential $420-720 thousand that can be used for conservation. This negatively affects, employment of local people, water pumping, fire break maintenance, etc. Our highly successful rhino anti-poaching efforts cost about $500-600,000 per year. Under the most adverse conditions we have grown our rhino population from some 42 animals in the mid 1990's to about 190 today.

If the hunting income is thus disallowed from sustainably using our elephant population, we would no longer be able to fund the protection of our highly endangered rhinos. Is there anything more proactive in conservation than using the income from one species present in excessive numbers to protect another which is highly endangered? By denying the importation of trophies into the USA major income is no longer available for the protection of endangered and highly endangered species. Our poachers would welcome this action by the US Government; we highly successful conservationist do not.

Brisendine, Amy <amy_brisendine@fws.gov>

ESA application # 83103C (Import of sport-hunted African elephant trophy from Namibia)

1 message

Brisendine, Amy <amy_brisendine@fws.gov> Mon, Sep 30, 2019 at 11:02 AM
To: "Emma C. Sampson" <permits@conservationforce.org>, (b) (6)
Cc: Amy Brisendine <amy_brisendine@fws.gov>

Hi Mr. Saulsbury,

I apologize for the delay in responding to you. I have your application dated March 23, 2018, for the import of a sport-hunted African elephant trophy hunted in Namibia in 2017.

I was not able to locate the hunting outfitter identified in your application in Namibia's Professional Hunting Directory (http://www.napha-namibia.com), Can you provide additional information about that hunting outfitter?

Also, can you provide information about the trophy fees that you paid? What were the fees, and can you provide information regarding how the funds used?

Do you know how much is being spent in the Nyae-Nyae Conservancy for poaching patrols and monitoring, conservation programs, and community support and involvement?

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 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.

Thank you and please contact me if you have any questions.

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D
Falls Church, Virginia 22041
703-358-2005 direct
https://www.fws.gov/international/permits/
https://www.cites.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
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SHANE MAHONEY
RENEE SNIDER

October 16, 2019

TRANSMISSION VIA EMAIL: amy_brisendine@fws.gov
Department of the Interior
Ms. Amy Brisendine
Government Information Specialist
Division of Management Authority
Branch of Permits; MS: IA
US Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041-3805

RE: SUPPLEMENT APPLICATION TO IMPORT SPORT-HUNTED TROPHY
PRT NO.: 83103C
APPLICANT NAME: MARK SAULSBURY
SPECIE: Loxodonta Africana [African Elephant]
COUNTRY: Namibia
CONCESSION: Nyae-Nyae Conservancy

Dear Ms. Brisendine:

In response to your email dated September 30, 2019, and supplementing the above captioned application, attached please find Nyae-Nyae Conservancy Responses to our Operator Enhancement Questionnaire.

If you have any additional question, please do not hesitate to contact us.

Kind regards,

/s/ Emma C. Sampson
PERMITS DEPARTMENT

JJJ/ecs

cc: File
Applicant: Mark Saulsbury via email: (b) (6) [redacted]

Enclosure:
a. Nyae Nyae Conservancy – Responses to Operator Enhancement Questionnaire

Brisendine, Amy <amy_brisendine@fws.gov>

[EXTERNAL] RESPONSE - ESA application # 83103C (Import sport-hunted African Elephant trophy Namibia)

1 message

Emma C. Sampson <permits@conservationforce.org> Thu, Oct 10, 2019 at 11:24 AM
To: "Brisendine, Amy" <amy_brisendine@fws.gov>, (b) (6)

Good morning Amy,

For appropriate action, attached please find response to your email dated September 30, 2019, to Mr. Mark Saulsbury.

Regards,

Emma

> On September 30, 2019 at 10:02 AM "Brisendine, Amy" <amy_brisendine@fws.gov> wrote:
>
> Hi Mr. Saulsbury,
>
> I apologize for the delay in responding to you. I have your application dated March 23, 2018, for the import of a sport-hunted African elephant trophy hunted in Namibia in 2017.
>
> I was not able to locate the hunting outfitter identified in your application in Namibia's Professional Hunting Directory (http://www.napha-namibia.com), Can you provide additional information about that hunting outfitter?
>
> Also, can you provide information about the trophy fees that you paid? What were the fees, and can you provide information regarding how the funds used?
>
> Do you know how much is being spent in the Nyae-Nyae Conservancy for poaching patrols and monitoring, conservation programs, and community support and involvement?
>
> *In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 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.*

Thank you and please contact me if you have any questions.

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D
Falls Church, Virginia 22041
703-358-2005 direct
https://www.fws.gov/international/permits/
https://www.cites.org

Emma C. Sampson
CONSERVATION FORCE, *Permits Division*
3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

2019.10.10 Response FWS e of 09.30.29 re SAULSBURY, Mark - Trophy Namibia.pdf
1951K

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SHANE MAHONEY
RENEE SNIDER

October 10, 2019

TRANSMISSION VIA EMAIL: amy_brisendine@fws.gov
Department of the Interior
Ms. Amy Brisendine
Government Information Specialist
Division of Management Authority
Branch of Permits; MS: IA
US Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041-3805

RE: RESPONSES TO FWS EMAIL OF SEPTEMBER 30, 2019
PRT No.: 83103C
APPLICANT NAME: MARK SAULSBURY

Dear Ms. Brisendine:

Below please find Applicant's responses to your email dated September 30, 2019, regarding the harvest of a Loxodonta Africana [Elephant] in Namibia:

1. I was not able to locate the hunting outfitter identified in your application in Namibia's Professional Hunting Directory (http://www.napha-namibia.com). Can you provide additional information about that hunting outfitter?
   I have included an attachment which was in the directory for Jacobs, SM – SMJ Safaris.

2. Also, can you provide information about the trophy fees that you paid? What were the fees, and can you provide information regarding how the funds used?
   Total cost for the hunt - $95,000 Approximately $45,000 retained by the outfitter for operating expenses.

3. Do you know how much is being spent in the Nyae-Nyae Conservancy for poaching patrols and monitoring, conservation programs, and community support and involvement?
   A total of $50,000 is paid to the Conservancy for anti-poaching, water/borehole installations, conservation programs and community support...

4. *Attached is a letter from Conservation Force to the US Fish and Wildlife, dated June 13, 2019. This letter includes an article highlighting a significant Conservation Award bestowed upon*

the Nyae Nyae Conservancy and SMJ Safaris for their successful conservation program. It also provides further information on how the funds are used.

5. *For reference, please see attached copy of the CITES Namibian Export Permit No. 0055547, approved on 28 February 2018.*

If you have any additional question, please do not hesitate to contact us.

Sincerely,

/s/ Emma C. Sampson
Permits Department

JJJ/ecs

cc: File
Applicant: Mark Saulsbury via email: *mark@saulsbury.com*

Enclosures:
a. FWS email dated September 30, 2019
b. Jacobs, SM from SMJ Safaris information
c. Conservation Force letter to FWS, dated June 13, 2019
d. CITES Namibia Export Permit No.: 0055547

(b) (6) [redacted]

From: Brisendine, Amy <amy_brisendine@fws.gov>
Sent: Monday, September 30, 2019 10:03 AM
To: Emma C. Sampson (b) (6) [redacted]
Cc: Amy Brisendine
Subject: ESA application # 83103C (Import of sport-hunted African elephant trophy from Namibia)

Hi Mr. Saulsbury,

I apologize for the delay in responding to you. I have your application dated March 23, 2018, for the import of a sport-hunted African elephant trophy hunted in Namibia in 2017.

I was not able to locate the hunting outfitter identified in your application in Namibia's Professional Hunting Directory (http://www.napha-namibia.com), Can you provide additional information about that hunting outfitter?

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Do you know how much is being spent in the Nyae-Nyae Conservancy for poaching patrols and monitoring, conservation programs, and community support and involvement?

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 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.

Thank you and please contact me if you have any questions.

Amy Brisendine
U.S. Fish and Wildlife Service
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5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D
Falls Church, Virginia 22041
703-358-2005 direct
https://www.fws.gov/international/permits/
https://www.cites.org

Jacobs, SM

Big Game Hunter

SMJ Safaris

PO Box 601
Grootfontein, Namibia

Tel: +264 (0) 67 232 678
Fax: +264 (0) 67 232 678
Cell: +264 (0) 81 128 8053

Email: **smj(at)iway.na**
Webpage: **www.smj-safaris.com**

[more information]

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SHANE MAHONEY
RENEE SNIDER

June 13, 2019

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

RE: Supplement to PRT No. 83103C, Saulsbury, Mark Application for Elephant Trophy

Dear Chief Cogliano:

This supplement is in support of Mark Saulsbury's application to import an African Elephant Trophy harvested from the Nyae Nyae Conservancy in Namibia in 2018. The Nyae Nyae Conservancy is Namibia's oldest conservancy and recently received an award for their outstanding efforts in wildlife conservation and game management from the International Council for Game and Wildlife Conservation (CIC).

In 1970 the Nyae Nyae Conservancy had no elephants and now there is an estimated 1500 to 2000. Through sustainable hunting and active rural stakeholders in the Conservancy, it can be said that tourism hunting and the quota system that is monitored by the Ministry of Environment and Tourism of Namibia is working.

Please find enclosed an article titled, "Nyae Nyae wins Conservation Award" *The Namibian* (Author: Steve Felton, May 10, 2019), published in Namibia's largest daily newspaper and the article from the CIC website.

Sincerely,

John J. Jackson III

Encl: Article, "Nyae Nyae wins Conservation Award", *The Namibian*, May 10, 2019
Article, "Edmond Blanc Prize awarded to the Nyae Nyae Conservancy and stakeholders", 10/5/ 2019

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Nyae Nyae wins conservation award

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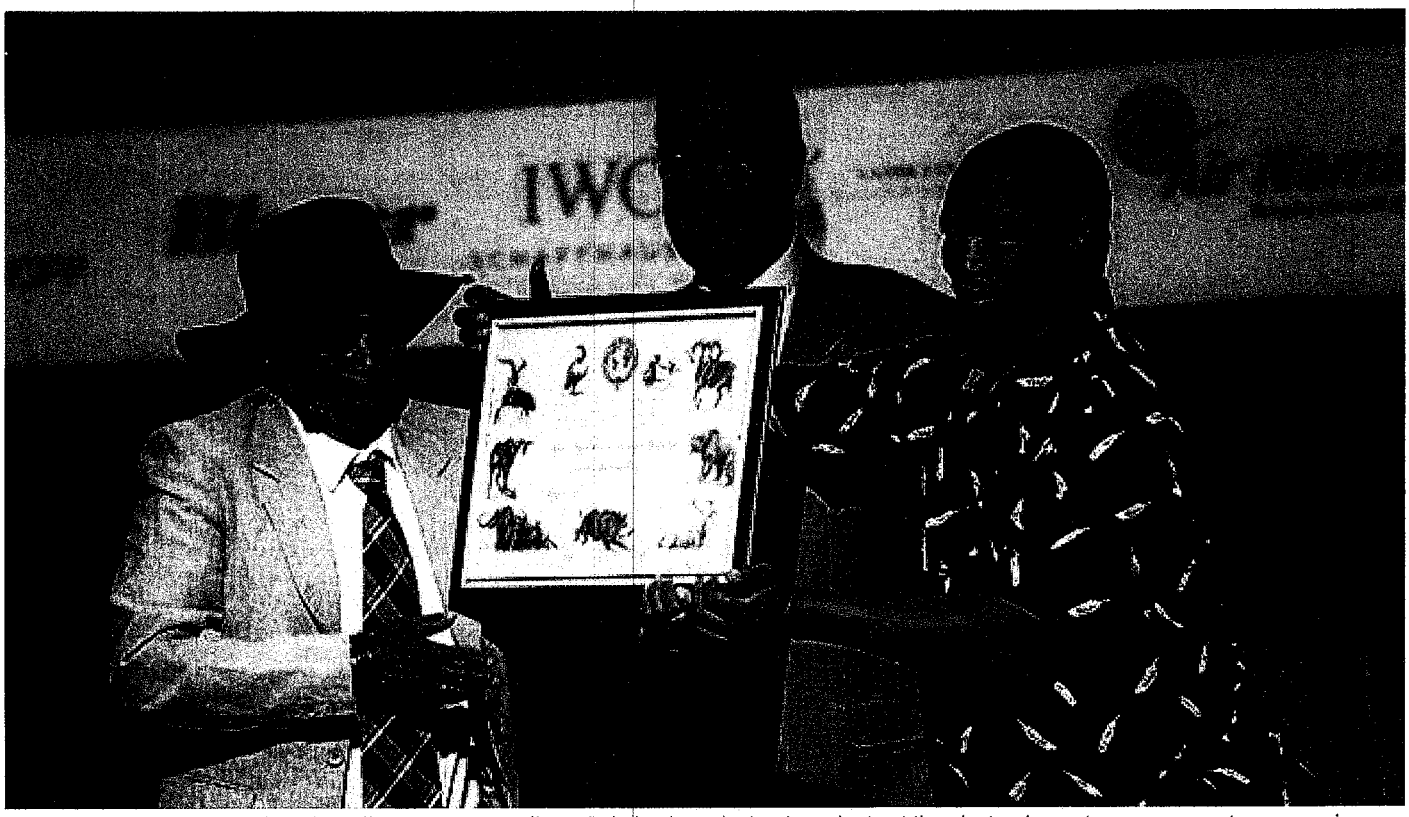


NEXT TO GODLINESS ... Ignatious Jingura sorts out discarded obsolete electronic gadgets at the electronic waste management company in Windhoek. He said in line with the launch of this year's national clean up campaign by environment minister Pohamba Shifeta in April which is scheduled for September, as well as the recent Windhoek municipality's recent clean-up campaign, people should always ensure they get rid of waste from their environment everyday. Photo: Contributed.

STEVE FELTON

NAMIBIA'S oldest conservancy, Nyae Nyae, was awarded the prestigious Edmond Blanc prize at an event held at the Safari Court Hotel in Windhoek on Saturday.

The International Council for Game and Wildlife Conservation (CIC) awards the prize for outstanding efforts in wildlife conservation and game management.

In the words of the CIC: "Only those game reserves, and game organisations that have had outstanding success in their work to conserve [the] natural environment, to protect free-roaming animals in the wild and to manage game according to principles of sustainability shall be eligible for the Edmond Blanc prize."

The prize was awarded to Nyae Nyae Conservancy and stakeholders, including professional hunter Stephan Jacobs of SMJ Safaris and the Ministry of Environment and Tourism.

It was presented to chief Tsamkxao ≠Oma, who explained traditional hunting methods to the modern trophy hunters gathered from around the world.

"We hunt without noise," he said. "In the past we would track an animal and then stay with it until the meat was finished. But this would chase other animals away, because of our smell."

Wishing to conserve and keep wildlife in the conservancy, the chief said they have created large hunting areas, away from the villages, to sustain wildlife for generations to come.

Referring to the changes since the conservancy was formed in 1998, the chief said that hunting is now done according to quotas set by the Ministry of Environment and Tourism based upon game counts.

Traditionally the San people only hunted what they needed to eat, said Tsamkxao ≠Oma, and the quota system also ensures that game is conserved.

In motivating the prize for Nyae Nyae, Rolf Baldus, a German economist who has published widely on conservation issues, said Nyae Nyae, located in the so-called Bushmanland in the north-east of Namibia, covers an area of approximately 900 000 hectares of wilderness, which is rarely found in Africa today.

"Sustainable hunting is one way to conserve and carefully develop [San] culture," writes Baldus. "It promotes wildlife conservation with clear measurable results through sustainable use of wildlife," and: "Through community involvement ... it has combated wildlife crime and continues to do so."

Poaching in the area is at a very low level.

Stephan Jacobs is the current professional hunter contracted by Nyae Nyae conservancy.

In a brief history of conservation hunting in Nyae Nyae, he stated that in 1970 there were no elephants in the area. They first migrated from the Zambezi area in 1971, and when the legendary hunter Volker Grellmann obtained the first hunting concession in the area, there were 80-100 bull elephants in Nyae Nyae.

Today there are between 1 500 and 2 000 elephants in the conservancy, according to Jacobs.

The hunter went on to state that conservation hunting actively conserves wildlife, and that plains game and lion numbers have increased dramatically in Nyae Nyae.

Modern hunting of game, including buffalo and a quota of nine elephants in 2019, is done with rifles, but tracking is still done on foot using the skills of San trackers who cover up to 30 kilometres a day.

Employment of trackers is one of the benefits of conservation hunting. Others include the employment of conservancy rangers and cash benefits to what was one of the poorest communities in Namibia, said Jacobs.

Almost all of the N$2 million paid out to conservancy members in each of the last two years comes from conservation hunting, which

also pays for water holes for game.

Meat for the community is also a vital benefit of sustainable hunting for a poor community, he said, with 30 tonnes being distributed.

Namibia, in its presentation to the CITES convention later this year, will argue that the sustainable use of wildlife brings financial and social benefits to rural communities and conservation benefits to wildlife.

In motivating the Edmond Blanc prize, Dr Baldus stated that Nyae Nyae "has followed strictly all Cites rules and fulfils fully the expectations of Cites that hunting protected species contributes to their conservation."

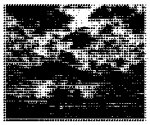
15 May 2019
Edmond Blanc Prize, General Assemblies, Latest News

Edmond Blanc Prize Awarded to the Nyae Nyae Conservancy and Stakeholders 10 May 2019

The Edmond Blanc Prize awards outstanding efforts in wildlife conservation and game management that are based on the principles of

CIC VIDEO CHANNEL

Social media – Friend or Enemy of Conservation'
15 May 2019



How hunting saves wildlife – Second part
15 May 2019

World Migratory Bird Day 2019
11 May 2019

Hungary joins the 1 Euro per Hunter Initiative
5 May 2019

Opening Ceremony – Crossroads – Leading the Way for

sustainable wildlife use. The International Council for Game and Wildlife Conservation (CIC) has been awarding game reserves, conservation associations and organizations since 1928, choosing one area every second year, honoring those that have had outstanding success in their work to conserve the natural environment, to protect free-roaming animals in the wild and to manage game according to principles of sustainability. During the closing ceremony of this year's 66th General Assembly, Namibia, the Edmond Blanc Prize was given to the Nyae Nyae Conservancy and Stakeholders, and was awarded to Stephan Jacobs for their work as professional hunters within the conservancy. A short dance was performed on stage to commemorate the occasion, which was followed by Chief Tsamkxao ≠Oma of the Nyae Nyae conservancy giving his thoughts as the Chief Bobo. He spoke of the changes since the creation of the conservancy, with particular mentions to the use of designated areas specifically for the purposes of hunting. Nyae Nyae's dedication to the use of modern hunting practices, and their adoption of hunting regulations and quotas, was also highlighted.

TWEETS

Tweets by @CICwildlife

CIC
@CICwildlife

#photoprize The theme of the 2019 photo prize is "Wildlife up close". Deadline: 28 February 2019. Applications to photo@cic-wildlife.org

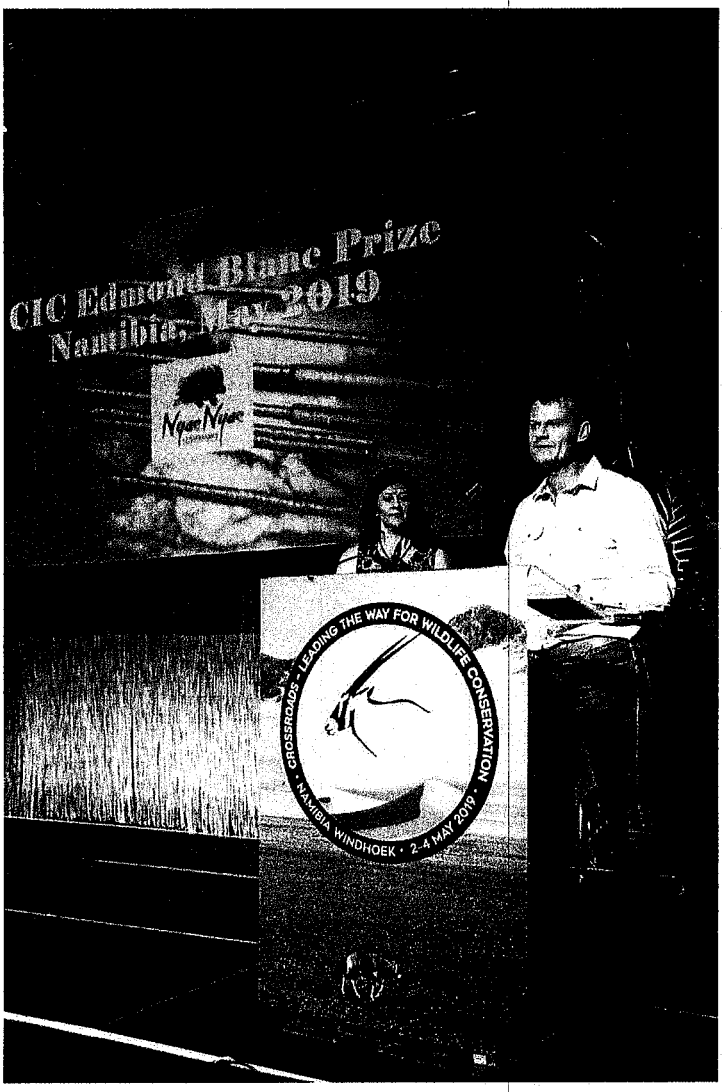
Jan 22, 2019

CIC
@CICwildlife

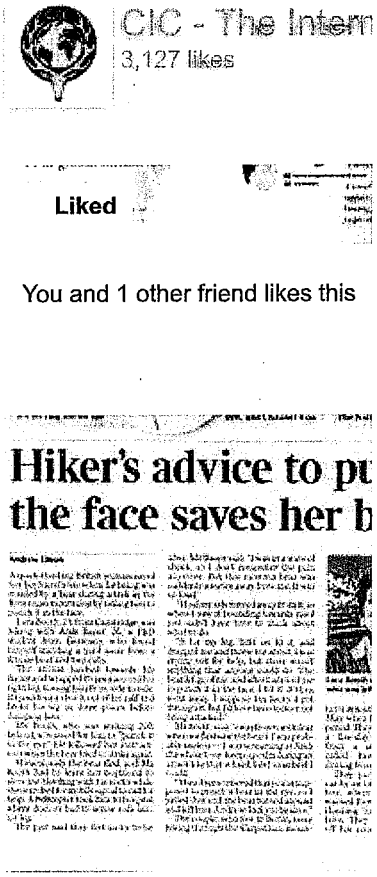
This year's #MarkhorAward winner is the 'Return of Rural Wetlands LIFE+ Project'! Congratulations! #conservation #wildlife

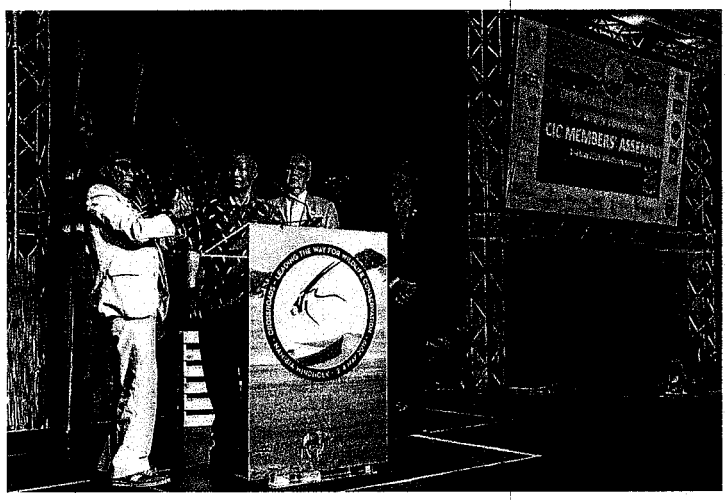
Embed View on Twitter

FACEBOOK



Stephan Jacobs then took the stage to give a statement on his experience as a professional hunter at the Nyae Nyae conservancy. He opened by stating the huge difference in elephant numbers, as well as lions and plains game, since the introduction of the conservancy in 1998; elephant numbers were estimated to be between 80-100 in 1978, with the current elephant population numbering between 1500 and 2000. Supplying water to these elephants was noted as one of their most significant achievements, with the average elephant bull consuming 250l of water a day.



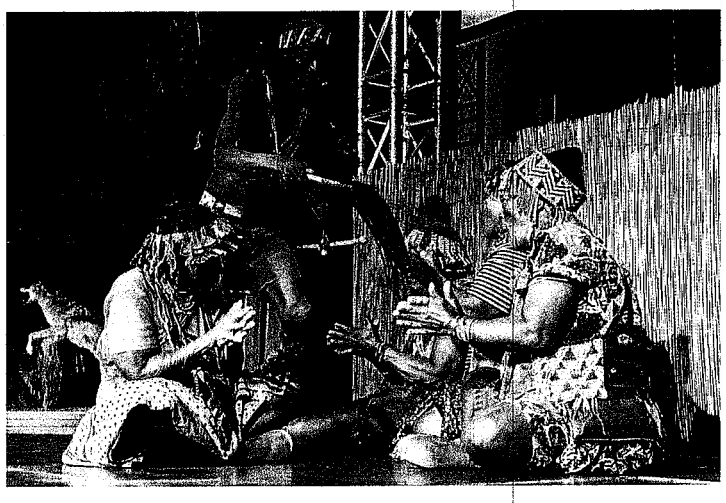


The contributions of trophy hunting and what is has achieved for Nyae Nyae were emphasized, which includes providing 85% of the conservancy's income, funding a number projects including a cash benefit (in 2017/18 more than 2 million Namibian dollars was given to conservancy members as cash benefits). Meat distribution, totaling more than 50 tonnes of meat per year, and job opportunities were regarded as additional benefits.

Mr. Jacobs also stressed the importance of the Sun people, who provide knowledge of traditional hunting techniques (such as tracking) and how to coexist with wildlife when living amongst them. He gave an overview of a typical day in his life as a professional hunter, which includes tracking and identifying elephants that are suitable to be hunted – on average they look through 80-100 elephant bulls before finding one sufficient in size, age and other characteristics.

Achievements of the Nyae Nyae Conservancy

Nyae Nyae was considered for this prize on the basis of their outstanding achievements in conservation, fulfilling multiple criteria set out by the CIC. Their work in the sustainable use of wildlife has yielded clear and measurable results through an increase in the number of wildlife, particularly in the restoration of elephant numbers in the conservancy. Aggregating data from aerial surveys, moonlight waterhole and foot transect counts, it was found that elephant numbers have increased at an average rate of 3.0% per year between 1998 and 2015. Much of this is due to the work that Stephan and his team have done in the creation of new boreholes that provide water to elephants – water can be considered a limiting factor to elephant population growth in this arid area.



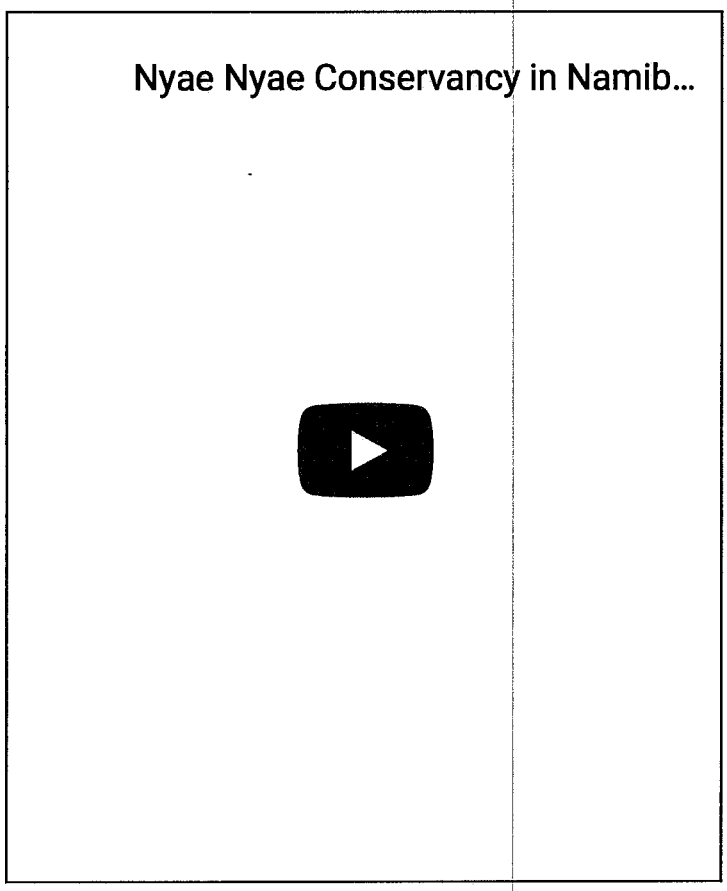
Their approach to community involvement in conservation was also commended. The model, which incorporates ideas of community based natural resource management, shifted the majority of revenues to the local San people. Nyae Nyae's community led approach gave local

community members a reason to care about wildlife, and provided the San people with employment opportunities. Stephen works closely with the San on hunts, making good use of their tracking abilities. In addition, the San's involvement in anti-poaching measures has led to the control of general poaching within the conservancy.

Their dedication to conducting responsible hunting was recognized as a further achievement by the CIC. Nyae Nyae has consistently elected professional hunters, acting as lease-holders for a five year period in the conservancy, that have shown their ability to successfully manage the conservational and socio-economic responsibilities associated with the role. In regards to their methodology when it comes to hunting, much care goes into choosing animals with the suitable characteristics. For the case of elephants, only older, post-productive elephant bulls are selected for this purpose. The hunting results of recent years are also impressive; the average weights of the tusks of all trophies were consistently well over 70 lbs with a positive, upwards trend – this is unmatched in Africa today.

The CIC would like to congratulate Mr and Mrs. Jacobs, as well as the Nyae Nyae Conservancy and stakeholders, on this achievement and we hope that their work can inspire others in the

sustainable wildlife use community to work towards even greater successes going forward.



LEAVE A REPLY

Your email address will not be published. Required fields are marked *

Name*

Email*

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: 28/08/2019

3. Importer (name and address)
Mark A. Salvino
(b) (6)

4. Exporter / Re-exporter (name,address and country)
S. M. Jacobs
P. O. BOX 801
Groottontein
Namibia

Signature of the applicant

3a. Country of import: U.S.A.

5. Special conditions
Not valid if not certified by the Namibian customs
Tuske nos: NA 17 0033 32.15 & NA 17 0034 34.25

All imports and exports remain subject to verterinary 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 ENVIROMENT AND TOURISM
Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp No.: 1555078

	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 Tuske	10. II W	11. 2 Item	11a. 11/90 (2018)
	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, cape, 2x skin panels & tail	10. II W	11. 6 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 progated for commercial purposes
★★★ for pre-Convention specimens

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
28 FEB 2019

13.THIS PERMIT IS ISSUED BY: J. Shapi

Windhoek — Place
28/02/2019 — Date
Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Landing / Air Waybill Number:

Block	Quantity
A	
B	
C	
D	

Port of Export / Re-export | Date | Signature | Official stamp and title

Original

Namprint: 2308

Brisendine, Amy <amy_brisendine@fws.gov>

[EXTERNAL] SUPPLEMENT - ESA PRT # 83103C (Import sport-hunted African elephant trophy- Namibia)

1 message

Emma C. Sampson <permits@conservationforce.org> Wed, Oct 16, 2019 at 3:50 PM
To: "Brisendine, Amy" <amy_brisendine@fws.gov>, (b) (6)

Dear Ms. Brisendine,

In response to your email dated September 30, attached please find letter and document to supplement Mr. Saulsbury's application.

Regards,

Emma

> On September 30, 2019 at 10:02 AM "Brisendine, Amy" <amy_brisendine@fws.gov> wrote:
>
> Hi Mr. Saulsbury,
>
> I apologize for the delay in responding to you. I have your application dated March 23, 2018, for the import of a sport-hunted African elephant trophy hunted in Namibia in 2017.
>
> I was not able to locate the hunting outfitter identified in your application in Namibia's Professional Hunting Directory (http://www.napha-namibia.com), Can you provide additional information about that hunting outfitter?
>
> Also, can you provide information about the trophy fees that you paid? What were the fees, and can you provide information regarding how the funds used?
>
> Do you know how much is being spent in the Nyae-Nyae Conservancy for poaching patrols and monitoring, conservation programs, and community support and involvement?
>
> *In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 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.*

Thank you and please contact me if you have any questions.

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D
Falls Church, Virginia 22041
703-358-2005 direct
https://www.fws.gov/international/permits/
https://www.cites.org

Emma C. Sampson
CONSERVATION FORCE, *Permits Division*
3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

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2 attachments

2019.10.16 Ltr Suppmt Import Applt ELEPHANT NAMIBIA-FWS 09.30.2019 - SAULSBURY,Mark.pdf
166K

Nyae-Nyae Operator Enhcmt Questionnaire 2019.10.pdf
5797K

CONSERVATION FORCE

OPERATOR ENHANCEMENT QUESTIONNAIRE

1. **OPERATOR INFORMATION**
   a. Name of Area Operator: S.M.J Safaris
   b. Years in business: 17 years
   c. Name of Company conducting hunt: S.M.J Safaris
   d. City where hunt will take place: Tsumkwe
   e. Country where hunt will take place: Namibia

2. **CONCESSION**
   a. Name of Concession: Nyae-Nyae Conservancy
   b. Area in Km^2: 890 000km2
   c. Land tenure: Nyae-Nyae Conservancy San people
      Government Lease ____ Community x Private Ranch ____ Private Conservancy
   d. Length of Concession Agreement: 5 years
   e. Can it be renewed? ____ Yes x No
   f. Length of Renewal, if applicable:
   g. Estimated total amount received in trophy fees last year, if applicable: US$ 357 900-00
   h. Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:
      We have to hand in annual reports on state of game and habitat status. We have to permanently employ 12 people from local origin. There are numerous programs were we as safari compony has obligations to educate some of the local people as PHs as well as skinners, drivers, and general camp staff. We normally send them to courses that the professional hunters association offer. We have an annual agreement to provide schools in the area with food for the children in the schools. We do antipoaching patrols in association with the conservancy game guards. It is the responsibility of the safari compony to maintain the 17 water points for game in the area. With out these water points the game in the area has no chance to survive. These water points are pumping 355 000 l of water a day for the game in the area.
   i. Please provide the Concession location and nearest City: North-East Namibia / Tsumkwe
   j. Please attach a map or maps with the boundaries marked and showing the nearest City
   k. If the Concession borders a National Park, please provide Park name: Kaudom National Park
   l. Description of general and distinctive habitat features and any water features:
      Genera Savanah with some natural water springs that does dry up during the dry season and then 17 borehole water points that are permanently.

3. **COMMUNITIES IN THE CONCESSION**
   a. Are there any communities living in the Concession? x Yes ____ No
   b. If so, estimated number of people or villages in the Concession? 2500
   c. Are there communities bordering this Concession? x Yes ____ No
   d. If so, estimated number of people or Villages around the Concession? Unknown

4. **RELEVANT GAME POPULATIONS IN THE CONCESSION:**[1]

[1] The new Fish and Wildlife Services (FWS) Import Permit Application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

SPECIES NAME	RELATIVE ABUNDANCE			ESTIMATED POPULATION	3-YEAR TREND			HOW IS IT MONITORED?
	DENSE	AVG.	SPARSE		UP	DOWN	STABLE	
ELEPHANT	x			2070	x			Research/counts
LION			x	15	x			Research/counts
LEOPARD	x			250	x			Research/ counts
PREY SPECIES			x	13160	x			Game counts

5. Local Community Participation

a. Total employment number: _____

b. Please identify the number and type of all employees:

Employee Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	3
Trackers	4	4
Anti-Poaching Scouts/Rangers	13	13
Other Anti-Poaching		
Cooks/Housekeepers	4	4
Community Coordinators	3	3
Managers	1	1
Biologists	5	5
Others: _____		

6. Number of staff employed in the off-season: All staff are permanently employed.

a. Please identify the number and type of staff that are engaged when the season is not open:

Employee Type	Total number of this type	Number of locals /from nearby communities	When employed?
Anti-Poaching staff	13	13	
Managers	1	1	
Maintenance	2	2	
Road Opening /Construction	2	2	
Community Relations Personnel	1	1	
Others:			

7. Anti-Poaching Efforts:[2]

a. Number of Anti-Poaching staff: 13

b. Are Anti-Poaching Patrols conducted during the hunting season, off-season, or both?
Hunting season: _____ Off-season: _____ Both seasons: x

c. Months during which Anti-Poaching Patrols are conducted: 12 months

d. Number of Anti-Poaching Patrols per month: 1-5

e. Description of Anti-Poaching equipment, vehicles, etc.:
Vehicles, Bino's and camping equipment as well as personal gear

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution?
MET, Conservancy as well as hunting operator

g. Do you offer rewards to poaching informants leading to arrest? x Yes _____ No

[2] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

7. ANTI-POACHING EFFORTS [*CONTINUATION*]

h. Do you offer rewards to poaching informants upon conviction? x Yes _____ No

i. Please describe the company's anti-poaching expenditures below:

TYPE OF EXPENSE	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
SALARIES FOR ANTI-POACHING SCOUTS	$14000,00	$15600,00	$16000,00	
EQUIPMENT	$10000,00	$10000,00	$10000,00	
VEHICLES		$35000,00		
PETROL	$1200-00	$1200-00	$1200-00	
REWARDS PAID				Poaching is very low in the area
OTHER: _____				
OTHER: _____				
TOTALS	$25200-00	$51800-00	$27200-00	

j. What currency are the expenditures given in? US$

8. ANTI-POACHING RESULTS:

CATEGORY	2016	2017	2018	REMARKS
POACHING INCIDENTS DISCOVERED	1	3	2	
ELEPHANT CARCASSES OBSERVED	0	0	0	
LION CARCASSES OBSERVED	0	0	0	
LEOPARD CARCASSES OBSERVED	0	0	0	
IVORY POACHERS ARRESTED	0	0	0	
MEAT POACHERS ARRESTED	0	4	2	
OTHER POACHERS ARRESTED	0	0	0	
POACHERS CONVICTED	0	0	0	
SNARES/GIN TRAPS COLLECTED	3	5	2	
FIREARMS CONFISCATED	0	0	0	
VEHICLES CONFISCATED	0	0	0	
BICYCLES CONFISCATED	0	0	0	
BOATS/NETS CONFISCATED	0	0	0	
TUSKS RECOVERED	0	0	0	
OTHER: _____				

9. COMMUNITY INVESTMENT:[3]

a. Does the Company contribute money or goods/services to local communities?
x Yes _____ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
50% of total income goes to local communities. Recuired by contract

c. Does the Company provide game meat to nearby communities? Yes x No _____

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:
All the meat hunted goes to the comminuties and this adds up to about 45 tons per season to estimate a value would be very difficult as elephant meat has not got a value on the open market as we cannot sell it. At normal game meat prizes this will add up to $ 75 000-00 per year

e. If the Company performs problem animal activities for surrounding communities (e.g.: patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.
We very seldomly gets PAC animals

f. Please describe any consolation payments made to local residents damaged by game species

g. What currency are the expenditures reported in? USD$

SPECIES	DAMAGE CAUSED	CONSOLATION PAID 2016	CONSOLATION PAID 2017	CONSOLATION PAID 2018
ELEPHANT				
LION				
LEOPARD				
OTHER				

a. Please describe any community projects paid for by the Company:
Most of the community programs are run by the conservancy trough the money earned from trophy hunting. There a lot of them climate change, sustainable usage, cattle breeding, family planning but to mention a few . The safari compony does provide it's workers with courses every three years that has direct needs in the safari compony, like PH's schooling housekeeping skinning vehicle maintenance and cooking courses

b. What currency are the expenditures reported in? As these project are run by the conservancy we cannot give an amount on them, from the compony side we have to spend $3500-00 every three years on training.

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
EDUCATION (E.G.: CLASSROOMS, OFFICES)				

[3] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

EDUCATION (E.G.: SCHOOL FEES, SCHOOL SUPPLIES)				
HEALTH (E.G.: CLINICS, OFFICES)				
HEALTH (E.G.: MEDICAL SALARIES, EQUIPMENT)				
COMMUNITY SCOUT SALARIES				
OTHER COMMUNITY ANTI-POACHING				

9. COMMUNITY INVESTMENT [*CONTINUATION*]

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
LOCAL GOVERNMENT ACTIVITIES				
WATER INFRASTRUCTURE IMPROVEMENTS				
SPORTS TEAMS FUNDED				
CONSTRUCTION MATERIALS DONATED				
OTHER: _____				
OTHER: _____				
TOTALS				

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	HUNTING ELEPHANT	HUNTING LION	HUNTING LEOPARD	HUNTING ALL SPECIES
NUMBER OF U.S. CLIENTS	**2016:** 1	**2016:** 0	**2016:** 1	**2016:** 3
	2017: 6	**2017:** 0	**2017:** 2	**2017:** 10
	2018: 3	**2018:** 0	**2018:** 1	**2018:** 4
PERCENTAGE OF U.S. CLIENTS	**2016:** 20%	**2016:** 0	**2016:** 35%	**2016:** 10%
	2017: 80%	**2017:** 0	**2017:** 65%	**2017:** 80%
	2018: 40%	**2018:** 0	**2018:** 35%	**2018:** 25%
TROPHY FEES PAID BY U.S. CLIENTS	**2016:** $45000	**2016:** 0	**2016:** $7000	**2016:** $5500
	2017: $245000	**2017:** 0	**2017:** $14000	**2017:** $25000
	2018: $100000	**2018:** 0	**2018:** $$7000	**2018:** $12000

11. Approximate Dollar amount and/or percentage of Company's revenue from U.S. Clients: $450 000-00
45%

12. OTHER INFORMATION: Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies (e.g., aging, size, resting areas), Concession Improvements (e.g.: digging and maintaining boreholes, restocking), Management Activities, Research, etc.

We have very strict hunting laws in the area that does not allow you to shoot close waterholes or roads nor from vehicles and also only during legal hunting times. Since we have taken over the hole area in 2017 we have fixed up all the game water points in the area which before the time only 20% of them were in working order. All village water points are maintained by the conservancy and even 5 new boreholes were made in the last few years. Community members not only get the meat from the meat distribution plan that we have in place but also gets about $200 000,00 payed out straight to them in cash from the moneys received from trophy hunting.

We in the area has picked up that from there has been issues with the importation of ivory from the Namibia to the USA our USA client base has really declined.

13. I declare that the foregoing is true and correct:

Nyae Nyae Conservancy
CONSERVANCY NAME

TELEPHONE: +264 811 288053

EMAIL: sms@iway.na

S.M. Jacobs.
OPERATOR – FULL NAME (PLEASE PRINT)

Owner
TITLE

SIGNATURE

nndf.org
CONSERVANCY WEBSITE

DRAFT

GAME COUNTS – LINE TRANSECTS

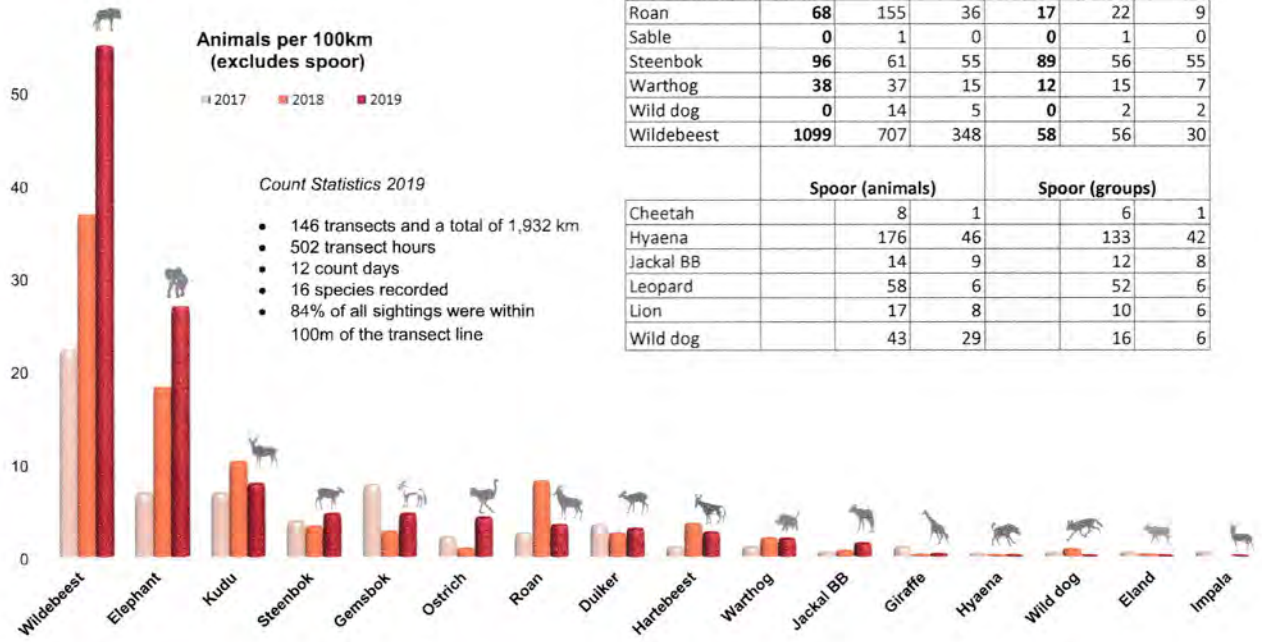
NYAE NYAE CONSERVANCY Jul/Aug 2019

Line Transects:

Area represented = 420,000 ha.

Animals seen

Species	Animals Seen			Groups seen		
	2019	2018	2017	2019	2018	2017
African Wild Cat	**1**	0	0	**1**	0	0
Duiker	**59**	47	51	**58**	44	48
Eland	**0**	2	5	**0**	2	1
Elephant	**537**	251	91	**75**	68	39
Gemsbok	**92**	51	122	**25**	17	23
Giraffe	**4**	2	16	**3**	1	4
Hartebeest	**51**	67	16	**7**	8	3
Hyaena	**1**	1	2	**1**	1	2
Impala	**0**	0	6	**0**	0	2
Jackal BB	**28**	11	6	**12**	8	6
Kudu	**157**	196	108	**50**	50	33
Lion	**1**	0	0	**1**	0	0
Ostrich	**84**	16	32	**30**	9	13
Porcupine	**4**	0	0	**3**	0	0
Roan	**68**	155	36	**17**	22	9
Sable	**0**	1	0	**0**	1	0
Steenbok	**96**	61	55	**89**	56	55
Warthog	**38**	37	15	**12**	15	7
Wild dog	**0**	14	5	**0**	2	2
Wildebeest	**1099**	707	348	**58**	56	30
	Spoor (animals)			**Spoor (groups)**		
Cheetah		8	1		6	1
Hyaena		176	46		133	42
Jackal BB		14	9		12	8
Leopard		58	6		52	6
Lion		17	8		10	6
Wild dog		43	29		16	6



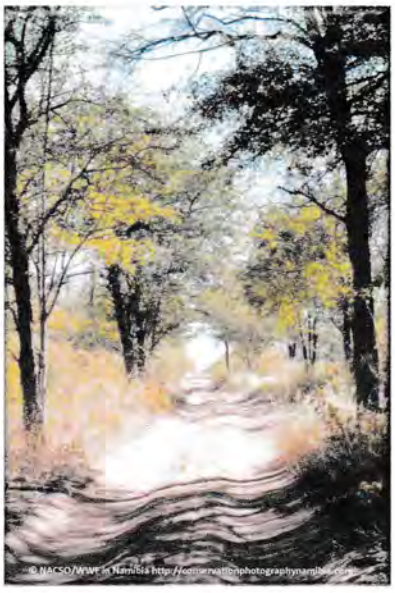
Count Statistics 2019

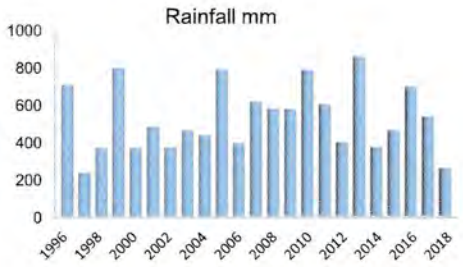
- 146 transects and a total of 1,932 km
- 502 transect hours
- 12 count days
- 16 species recorded
- 84% of all sightings were within 100m of the transect line

Estimates

Species	Estimate	95% CL Low	95% CL High	Model
Duiker	**1,030**	660	1,620	HN
Elephant	**2,070**	1,280	3,350	HN
Gemsbok	**680**	365	1,280	HN
Hartebeest	**300**	140	750	U
Kudu	**1,455**	980	2,160	HN
Ostrich	**280**	145	540	U
Roan	**650**	320	1,300	U
Steenbok	**2,195**	1,590	3,035	HN
Warthog	**185**	100	350	U
Wildebeest	**5,185**	3,280	8,200	U

Estimates (rounded) were derived using DISTANCE analysis which takes account of drop-off in animal detectability with distance from the transect line. Ten species had sufficient sightings to adequately derive species detection curves and therefore produce estimates. Model: U=uniform; HN=half normal.





Synopsis

Line transects were started in 2017 and represent almost half of the total area of the conservancy and include most of the waterholes. The area not covered by transects has low animal densities due to reduced habitat suitability and people pressure.

Transect counts have recorded 22 species including 6 predator species. Based on spoor sightings hyaena are the most common predator, followed by leopard and wild dog.

The top 3 species in terms of sightings between 2017 and 2019 included wildebeest, elephant and kudu.

Brisendine, Amy <amy_brisendine@fws.gov>

[EXTERNAL] RE: ESA application # 83103C (Import sport-hunted African Elephant trophy Namibia)

1 message

Mark Saulsbury (b) (6) Tue, Nov 19, 2019 at 3:53 PM
To: "Brisendine, Amy" <amy_brisendine@fws.gov>, "Emma C. Sampson" <permits@conservationforce.org>
Cc: Mark Saulsbury (b) (6) >

Amy,

Please provide an update on the status of this applicaon…..

Thanks for your assistance….

Mark Saulsbury

From: Brisendine, Amy [mailto:amy_brisendine@fws.gov]
Sent: Friday, October 18, 2019 1:38 PM
To: Emma C. Sampson <permits@conservationforce.org>
Cc: Mark Saulsbury (b) (6) >
Subject: ESA applicaon # 83103C (Import sport -hunted African Elephant trophy Namibia)

Received, thank you. I will review this and let you know if I have any questions.

Amy Brisendine

U.S. Fish and Wildlife Service

International Affairs, Division of Management Authority

5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D

Falls Church, Virginia 22041

On Thu, Oct 10, 2019 at 11:27 AM Emma C. Sampson <permits@conservationforce.org> wrote:

Good morning Amy,

For appropriate action, attached please find response to your email dated September 30, 2019, to Mr. Mark Saulsbury.

Regards,

Emma

Mark Saulsbury | Senior Vice President

(b) (6)

CONFIDENTIALITY NOTE: The information transmitted, including attachments, is intended only for persons(s) or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or use of, or taking of any action in reliance upon the information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and destroy any copies of this information.

On September 30, 2019 at 10:02 AM "Brisendine, Amy" <amy_brisendine@fws.gov> wrote:

Hi Mr. Saulsbury,

I apologize for the delay in responding to you. I have your application dated March 23, 2018, for the import of a sport-hunted African elephant trophy hunted in Namibia in 2017.

I was not able to locate the hunting outfitter identified in your application in Namibia's Professional Hunting Directory (http://www.napha-namibia.com), Can you provide additional information about that hunting outfitter?

Also, can you provide information about the trophy fees that you paid? What were the fees, and can you provide information regarding how the funds used?

Do you know how much is being spent in the Nyae-Nyae Conservancy for poaching patrols and monitoring, conservation programs, and community support and involvement?

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 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.

Thank you and please contact me if you have any questions.

Amy Brisendine

U.S. Fish and Wildlife Service

International Affairs, Division of Management Authority

5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D

Falls Church, Virginia 22041

703-358-2005 direct

https://www.fws.gov/international/permits/

https://www.cites.org

Emma C. Sampson
CONSERVATION FORCE, *Permits Division*
3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Williams	Christopher	Shawn	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		n/a

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Anniston	AL	36207	Calhoun	USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applic*** e information submitted in this application for a permit is complete and accurate to the best of (b) (6) may subject me to the criminal penalties of 18 U.S.C. 1001.

Signat (b) (6) ped 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 ivo[redacted]e-exported.

Applicant's signature: (b) (6) 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 № 1397

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	Environmental Affairs
ADDRESS	Musina
PROVINCE	Limpopo

DETAILS OF PERMIT HOLDER

NAME	Mr Christopher Shawn	ID NO.	
SURNAME	Williams	PASSPORT NO.	(b) (6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS		
ADDRESS		(b) (6)
ADDRESS		Anniston, AL
TOWN		36207
POSTAL CODE		USA
PROVINCE		

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)	Maremani Nature Reserve

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
African Elephant	Loxodonta africana	Male	1 (one)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

To hunt one elephant bull during the day with a rifle. Tusk 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 kg & ZA 16 2220 8,0 kg 19/5/16
MICROCHIP NUMBER	N/A

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 07/05/2016	TO: 18/05/2016	
RECEIPT NUMBER	107520	DEPARTMENT OF ECONOMIC DEVELOPMENT, ENVIRONMENT & TOURISM	
		AUTHORISED / NOT AUTHORISED	
SIGNATURE OF ISSUING OFFICER:		SIGN	(b) (6)
DATE STAMP:	2016 -05- 05	SIGNATURE	
		WILDLIFE TRADE & REGULATION	

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt Commenced 07 / 05 / 2016 Terminated 18 / 05 / 2016

A. LP Nº 081096

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 P JANSEN

Business Address EAST CRESCENT1
MUSINA
0900

ID No 8103155035086

PH Permit No 0098 CPM 401-01-277

Date 18/05/2016 Signature Jansen

CLIENT

Name Christopher Shawn WILLIAMS

Permanent Postal Address (b) (6)
(b) (6) ANNISTON, AL

Code 36207 Country U.S.A

Passport No (b) (6)

Tel/Fax

Date 18/05/2016 Signa (b) (6)

HUNTING OUTFITTER

Name P C JANSEN

Business Address EAST CRESCENT1
MUSINA Code 0900

ID No 5905265008081

Tel No 0155340207 Fax No —

HO Permit No ZA/LP/75275

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 From	Date of Hunt To	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
MAREMANI Singelele nature Reserve MT6	MUSINA	P C JANSEN P.O. Box X1225 MUSINA 0900	0 13976	07/05/2016	16/05/2016	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

Code

Country Trophy Export Date (Estimate)

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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

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

March 22, 2018

RCVD MAR 27 2018

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

Re: Applications for Import of Sport-Hunted Trophies

Dear Chief Van Norman:

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

- The first applicant is hunting a lion in Namibia at Kalahari Game Lodge, a 400 km^2 property that borders the Kgalagadi Transfrontier Park. This property maintains an increasing population of wild lion. The property is fenced on one side, and species must be managed to conserve the biodiversity and maintain the lion population and habitat quality. The property has identified two lion this year suitable for hunting. The hunting will generate revenues to be reinvested in wildlife management, poaching control, and local employment. Please see the attached letter from the landowner, and please consider this information and the information submitted by Namibia's Ministry of Environment and Tourism in making a positive enhancement finding for this applicant. 84926C
- The second applicant is hunting an African lion in the Selous Game Reserve, Tanzania, with Rungwa Game Safaris. We previously provided an enhancement report from Rungwa Game Safaris and have enclosed it again for ease of reference. This company invests heavily in anti-poaching and community livelihoods. Its areas maintain healthy lion populations, and the company abides by a six-year age restriction on trophies. Please consider the enhancement report and the other information provided by Tanzanian authorities and Conservation Force in making a positive enhancement finding for this applicant.
- The third applicant is hunting elephant and lion with Mopane/Nyamvu Safaris in Zambia in 2018 and 2019, respectively. We previously submitted operator enhancement reports from these companies and have enclosed the reports again for ease of reference. These companies together invest over $61,000/year in anti-poaching, $45,000/year in community projects, and $30,000/year in game meat distributed to rural villages. In their concessions, the companies are securing elephant populations and lion prey species from poaching. The companies are recovering populations that had suffered from bushmeat poaching. The companies are enhancing the survival of elephant and lion by addressing the primary threats to each species. Please consider the enclosed enhancement reports and the information provided by Zambian authorities and Conservation Force in making a positive enhancement finding for each of these applications.

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

Sincerely,

Regina Lennox

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

RCVD MAR 27 2018

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted 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~~y~~ 2 ies 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) [redacted]

Name: Samuel James Cunningham

Date: 03/19/2018

Form 3-200-20

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

Federal Fish and Wildlife Permit Application Form

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

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

Type of Activity:

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cunningham	Samuel	James	na

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

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

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

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Amarillo	Texas	79124	Potter	USA

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

same

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
same	same	same	same	same

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 100

(b) (6)

Signature of app[illegible] or stamped signatures) — Date of signature (mm/dd/yyyy): 03/19/2018

Please continue to next page

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

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

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

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

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

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

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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

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

---

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

   Same

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

   Applicant or attorneys with Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

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

na

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      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 Cockroft
   Business Name: Splitting Image Taxidermy
   Address: PO Box 27582, Greenacres
   City: Port Elizabeth
   State/Province: East Cape
   Country, Postal Code: South Africa 6057
   Telephone: +27 41 581 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: (b) (6) 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
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RCVD AUG 28 2019

August 23, 2019

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

RE: WITHDRAW PRT No. 849266

Dear Chief Cogliano:

Please be advised that Samuel James Cunningham is withdrawing his application for an elephant trophy from Zambia.

PRT No. 849266

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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RCVD AUG 28 2019

August 23, 2019

Wrong PRT number.
?
849266

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

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SHANE MAHONEY
RENEE SNIDER

March 28, 2018

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

RCVD MAR 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

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

NOTICE OF REPRESENTATION

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

Signe (b) (6) [redacted]

Name: Steven G. Reeves

Date: 7 March 2018

Form 3-200-20

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

Federal Fish and Wildlife Permit Application Form

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

LB

RCVD MAR 30 2018

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

Type of Activity:

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Reeves	Steven	Glen	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6) [redacted]			

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ Initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (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) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Hooper	UT	84315	Weber	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted] — 7 March 2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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

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

---

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

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

   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, 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, SENGWE 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: SSG SAFARIS
   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 + ZIMBABWE

   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) [redacted] 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

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

September 5, 2019

VIA CERTIFIED MAIL AND EMAIL

LB

David Bernhardt, Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240
exsec@ios.doi.gov

Margaret Everson, Principal Deputy
Director,
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington DC 20240
margaret_everson@fws.gov

Daniel Jorjani, Esquire, Acting Solicitor
Principal Deputy Solicitor
Department of the Interior
1849 C Street, S.W.
Washington, DC 20240
daniel.jorjani@sol.doi.gov

Karen Budd-Falen, Esquire
Deputy Solicitor for Parks and Wildlife
Department of the Interior
1849 C Street, S.W.
Washington, DC 20240
karen.budd-falen@sol.doi.gov

Eric Alvarez
Acting Assistant Director for International Affairs
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington DC 20240
Aeric_alvarez@fws.gov

Director,
Division of International Conservation
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dr. Mary Cogliano, Chief Branch of Permits,
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
mary_cogliano@fws.gov

Re: 60 day notice of intent to sue for failure and refusal to process elephant trophy import permit applications.

Dear Ladies and Gentlemen:

This is a 60-day Notice of Intent to Sue under the Endangered Species Act, 16 U.S.C. Sec. 1531 et seq. ("ESA"), for failure and refusal to process elephant trophy import permit applications in violation of the Administrative Procedures Act, 5 U.S.C Sec. 553 et seq. ("APA"), the Rules and Regulations of the Department implementing the ESA, *see* 50 CFR Part 17, the Special ESA Elephant Regulations, 50 CFR 17.40, regulations implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora, Mar. 3, 1973, 27 U.S.T. 1087 (hereinafter "CITES"), *see* 50 CFR Part 23, and the general permitting regulations of the United States Fish and Wildlife Service ("USF&WS" or "Service"), *see* 50 CFR Part 13.

This notice is on behalf of Dallas Safari Club ("DSC"), their members who desire to engage in trophy sport hunting of African elephants, outstanding elephant trophy import applicants, DSC conservation partners, including Sango Safaris, the Namibia Ministry of Environment and Tourism, the Namibian Association of CBNRM Support Organisations ("NASCO"), and the individual permit applicants set forth on Attachment A to this letter.

The African elephant (*Loxodonta africana*) is listed as threatened under the ESA and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(e)]. The 4(d) special rule lists the requirements for the import of sport-hunted trophies. Under paragraph 17.40(e)(6)(i)(B), for the USF&WS to issue a threatened species permit under 50 CFR 17.32, authorizing the import of a sport-hunted elephant trophy, the Service must make a determination that the killing of the trophy animal will enhance the survival of the species.

Pursuant to the APA, the Service is required to process these permit applications and make a decision on them within a reasonable time. 5 USC 558(c). 50 CFR 13.11 provides

that permit applications will be processed "as soon as possible." And 5 USC 706 provides for judicial review of "agency action unlawfully withheld or unreasonably delayed." Moreover, the delay is denial without appeal in violation of 50 CFR 13.29 or judicial review, *see* APA section 706. The delay also conflicts with the duty the Service has under the ESA to recover the listed species and the enhancement that the permitting would encourage, thus violating 16 U.S.C. 1533(f) and 16 U.S.C. 1540.

A "hold" has been put on the processing of all elephant trophy import permit applications since November 2017 after President Trump issued two "tweets" on 17 and 19 November 2017 on his Twitter account @realDonaldTrump. The effect of this hold following the President's tweets has been to injure conservation efforts designed to protect the African elephant. This hold is further injurious to the people of the countries the elephants inhabit as the local population benefits from controlled sport hunting of elephants, a fact the Service has previously acknowledged.

Although positive enhancement determinations for Zambia and Zimbabwe were made immediately before the "hold" in November 2017, Namibia and the Republic of South Africa enhancement findings were neither new nor disputed. The positive enhancement determination for Zambia had not been suspended. By any standard, the countries of Botswana, Namibia, South Africa, Tanzania, Zambia and Zimbabwe have done nothing to deserve this mistreatment, and breach of treaty, law and regulations. A "tweet" is not a proper rule making. Moreover, this hold has been extended to all elephant trophy imports including from countries where the Service had longstanding positive enhancement findings that were the "gold" standard.

Subsequently, on March 1, 2018[1], the Service issued a memorandum in response to the D.C. Circuit Court's opinion in *Safari Club Intl., v. Zinke*, 878 F.3d 316 (D.C. Cir., 2017) which withdrew enhancement findings, including the enhancement findings for Zambia and Zimbabwe, and stated that

> All of the above referenced findings are no longer effective for making individual permit determinations for imports of those sport-hunted ESA-listed species. However, the Service intends to use the information cited in these findings and contained in its files as appropriate, in addition to the information it receives and has available when it receives each application, to evaluate individual permit applications. The Service is continuing to monitor the status and management of these species in their range countries. At this time, when the Service processes these permit applications, the Service intends to do so on an individual basis, including making ESA enhancement determinations, and CITES non-detriment determinations when required, for each application. The Service intends to grant or deny permits to import a sport-hunted trophy on a case-by-case basis pursuant to its authorities under the ESA and CITES.

[1] https://www.fws.gov/international/pdf/memo-withdrawal-of-certain-findings-ESA-listed-species-sport-hunted-trophies.pdf

> As part of the permitting process, the Service reviews each application received for import of such trophies and evaluates the information provided in the application as well as other information available to the Service as to the status of and management program for the species or population to ensure that the program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized.

This determination was not made as the result of the rule making proceeding ordered by the court in *Safari Club Intl. v. Zinke,* and would appear directly inconsistent with the court's opinion. Nonetheless, despite the statements contained in the Service's March 1, 2018, memorandum, all elephant import permits have remained on "hold." This is true for pre-act elephant trophies and renewal applications for elephant trophy import permits predating the "hold." The Service is not processing elephant import permits on a case by case basis or on any basis whatsoever. This lack of action is contrary to the law and applicable regulations.

The Service is unlawfully employing the "hold" on elephant trophy import permitting to elephant trophy imports from all countries, and even to the simple renewal of elephant import permits and to pre-act elephant trophies. The "hold" has been applied unlawfully to the detriment of the very best and most successful elephant management programs in Africa. The broadly applied "hold "was not a duly noticed and made rule making, was arbitrary, capricious and irrational, and greatly threatens the elephant and range nation programs the ESA and CITES aim to encourage and enhance. Indeed, the "hold" jeopardizes and obstructs years of conservation activities in Southern and a substantial part of Eastern Africa.

Tanzania, Zambia, Zimbabwe, Mozambique, Botswana, Namibia and South Africa hold an estimated 340,000 elephants out of a continental total of 415,000, i.e. 82 per cent of the elephants of Africa. The conservation success of these countries is linked to policies incorporating sustainable use of natural resources, based on science and aiming at improving livelihoods of rural communities while maintaining vast tracts of unspoiled habitat and ecosystems.

The tolerance by the rural citizens of Southern and Eastern Africa of elephants is increased through hunting revenue sharing systems in place throughout the region. The presence of substantial herds of elephants risk serious devastation of the crops on which the rural African population depend. Without the revenue generated by sport trophy hunting, the population would view the elephant more as pests than as a natural resource. Moreover, overpopulation of elephant threatens the habitat of other threatened species. *See* Statement of Sango Safaris, Attachment B.

The "hold' obstructs 70 per cent of the revenue of the Community Conservancy Program in Namibia. All tourist safari hunting of elephant occurs in community

conservancy areas. Likewise the hold obstructs the same percentage of the revenue of the 700,000 families which depend on the CAMPFIRE Program in Zimbabwe. The "hold" undermines the community Wildlife Management Areas in Tanzania that are intended to provide incentivizing livelihoods to rural communities and to act as corridors for elephant and other species between protected areas. The "hold" obstructs the community program in Zambia which largely relies upon tourist safari elephant hunting. The "hold" largely blocks the developing elephant conservation strategy in Botswana that recently has lifted the suspension of tourist safari hunting. Tourist safari elephant hunting had previously been 70 per cent of community revenue in that country.

Therefore, the "hold" is jeopardizing conservation efforts in these countries and threatens the livelihood of more than one million persons and the biodiversity of millions of hectares of pristine wilderness. Without the management and revenues from tourism hunting, these lands are being encroached and converted to agro-pastoral land, leading to the unavoidable extinction of wildlife and natural habitats, and the collapse of ecosystem services.

The successful elephant conservation as well as the control of poaching largely depend upon the sustainable use conservation strategy in the form of elephant tourist safari hunting in each of these countries. The elephant populations and programs in these countries cannot be sustained without the revenue generated by safari hunting and U.S. import of the trophies; hence the "hold" is *the* major threat to the survival of the largest remaining elephant populations in Africa. Hundreds of thousands of elephants are in jeopardy and more than a million families are being deprived of the realization of their single most valuable natural resource because of this illegal "hold."

Finally, tourist safari hunting of elephant is governed by sound administrative systems in all countries that include scientific based quotas supported by CITES non-detriment findings, law enforcement largely funded or carried out by safari hunting operators on the largest share of wild habitat, regulatory permitting, and community-based conservation programs, most of which was supported by over one-hundred million dollars of USAID funding because of its conservation and humanitarian merit.

In conclusion, on behalf of DSC, its members, outstanding elephant trophy import applicants, and DSC conservation partners, and for the reasons stated in this notification, we intend to sue under the Endangered Species Act for failure and refusal to process elephant trophy import permit applications.

Respectfully,

Scott Tobermann
DSC President

13709 Gamma Road, Dallas, TX 75244 * (972) 980-9800 * Fax (972) 980-9925
E-Mail: info@biggame.org * Webpage: www.biggame.org

INDIVIDUALS WITH PERMIT APPLICATIONS PENDING

ATTACHMENT A

PRT #	Last Name	First Name	Area	Date of Hunt	Date of Application
93406C	Evans	Milton Karl	Zimbabwe, Dande North Hunting Concession	5/17-5/30/2018	5/10/2018
84788C	Reeves	Steve	Zimmbabwe, Semore 1 +2 , TTL Campire Ares	April 13-24, 2018	3/7/2018
MA18507C-0	Rogers	Anthony	Zimbabwe, Matabeland South	7/29-8/16, 2017	1/11/2017
MA33591C	Cheek III	Atlas	Zimbabwe, Chewore North Safari Area	7/28/2014	4/18/2017
US58155C	Crippen	Daniel	Zimbabwe, Matetsi Safari Area, Unit 5, Victoria Falls	8/11/2017	9/25/2017
MA57769C-0	Crippen	David	Zimbabwe, Matetsi Safari Area, Unit 5, Victoria Falls	8/20/2017	9/25/2017
033669C/9	Hanson	Arlene & Bob	Zimbabwe, Tsholotsho	9/1/2016 to 9/15/2016	
MA48117D	Weaver	John	Namibia, Zambezi (Caprivi) Region		6/28/2019
83103C	Saulsbury	Mark	Namibia, Nyae-Nyae Conservancy	8/8/2017	3/5/2018
85343C	Ottmers	Bryan	Zimbabwe, Save Valley Conservancy	8/1/2015 to 8/14/2015	3/19/2018
	Pirkle	Mark	Namibia, Shamakuve Concession	9/14/2019 to 10/14/2019	6/20/2019
MA06118C	Easter	Joe (Lane)	Zimbabwe		

Attachment B

STATEMENT OF SANGO SAFARIS OF SAVE VALLEY SAFARIS, ZIMBABWE

Sango Safaris represents a 60,000 hectare property, situated within the Save Valley Conservancy ("SVC") in the South Eastern Lowveld of Zimbabwe.

The annual 2018 aerial survey, carried out every September/October for the past 20 some years showed a population of 665 elephant on Sango last year. As an average in recent years we have from 600 to over 900 elephants on Sango at any given moment. Our ecologically established carrying capacity ranges between 200 to 300 elephants. Therefore, we have at any given moment between 400 to 700 too many elephants on Sango with devastating destruction not only to the food base of the species causing the destruction but with dire consequences for all other plains game animals.

For example the Elephants' destruction as well as decreasing rains have resulted in our zebra and wildebeest herds dropping from 1,500 to 2,000 to around 600 of each species today. Similar numbers are experienced for all other grazers. Aerial Survey numbers for elephants on Sango since 2009 are as follows:

No. Elephants	Year
654	2009
462	2010
393	2012
648	2013
474	2014
497	2015
949	2016
684	2017
665	2018

The latter shows a current density of 1.1 elephant per square kilometer, whilst the recommended density is 0.2-0.3 per square kilometer for the dry Savanna areas we occupy.

The continued high density of elephant has and is having a very negative affect on Sango's habitats. For example the baobab trees of which we have an abundance are often hundreds if not thousands of years old. Approximately 90 per cent of all of our baobab trees are now suffering damaged by elephants. If this remains unaddressed Sango will have lost all its baobab trees in a matter of a few years.

Sango practices "sustainable utilization" and is proactive in the use of its excess animals, which income funds our further conservation efforts. To this end, Sango moved 100 live elephants to reduce their numbers and to help restock the Zimbabwe National Parks area in 2018. Such translocation solutions do not exist regularly as most national parks and private conservancies within a survivable translocation distance from Sango are overstocked with elephants as well.

The annual elephant hunting quota amounts to three older bulls for Sango and seven in total for the SVC. All funds generated from hunting flow fully towards running, protecting and maintaining the property and specifically its wildlife assets and the underlying habitats. This includes employment for 135 local people (44 of whom are anti-poaching scouts) provision of water for wildlife, fire breaks, road and infrastructure maintenance and a full time ecologist.

Sango forms the largest single property within the SVC. The most recent SVC elephant numbers are from a 2017 Aerial survey, (2,390 km2 of operating properties) and showed that SVC was home to 2038 elephants. This is an average of 0.85 elephant per km2 when the recommended density is 0,2-0,3 Km2. As per above formula this implies that we have approximately 1,500 elephants too many. However, we believe that the total elephant population in the SVC amounts presently to some 2,500 animals.

Elephant safaris bring in between $60 - 70,000 for each elephant. WWF recommends a trophy hunting quota of 0.75 per cent of an elephant population whilst we are not even hunting half of that quota. So the SVC and its members are prejudiced of a potential $420-720 thousand that can be used for conservation. This negatively affects, employment of local people, water pumping, fire break maintenance, etc. Our highly successful rhino anti-poaching efforts cost about $500-600,000 per year. Under the most adverse conditions we have grown our rhino population from some 42 animals in the mid 1990's to about 190 today.

If the hunting income is thus disallowed from sustainably using our elephant population, we would no longer be able to fund the protection of our highly endangered rhinos. Is there anything more proactive in conservation than using the income from one species present in excessive numbers to protect another which is highly endangered? By denying the importation of trophies into the USA major income is no longer available for the protection of endangered and highly endangered species. Our poachers would welcome this action by the US Government; we highly successful conservationist do not.

BISON CONNECT

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry Prt # 94788C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Thu, Oct 3, 2019 at 3:10 PM
To: permits@conservationforce.com, r(b) (6)

Steven,

On 03/30/2018 an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 84788C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

[EXTERNAL] Supplement to all outstanding Zimbabwe Elephant Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Tue 6/2/2020 4:57 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (1 MB)

SupplementalLettertoUSFWS.zimbabweElephants.docx; CampfireConcernonImportBans.pdf;

Mr. Brisendine,

Please see the attached letter and document to be included with all applicants listed, which should be all outstanding elephant import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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RENEE SNIDER

June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Elephant** import permit applications for applicants listed below – all in Zimbabwe

Atlas Cheek, III	33591C
Michael Condon	53018D
Daniel Crippen	58155C
David Crippen	57769C
Joe Easter	06118C
Brent Goyen	05190C
Arlene Hanson	03369C
John Johnson	53722D
Jonathan Jones	14862D
Donald Moritz	70854D
Jeffery Nicholas	10635C
Sam Noble	09883C
Sam Noble, Jr.	988649C
Sam Noble Jr.	09644C
Bryan Ottmers	85343C
Steve Reeves	84788C
Anthony Rogers	18507C
Stephen Shell	No PRT # (would like to get #)
Thomas Whaley Jr.	04847C
Todd Williams	76700D

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for elephants in Zimbabwe that further detail the elephant populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the

value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

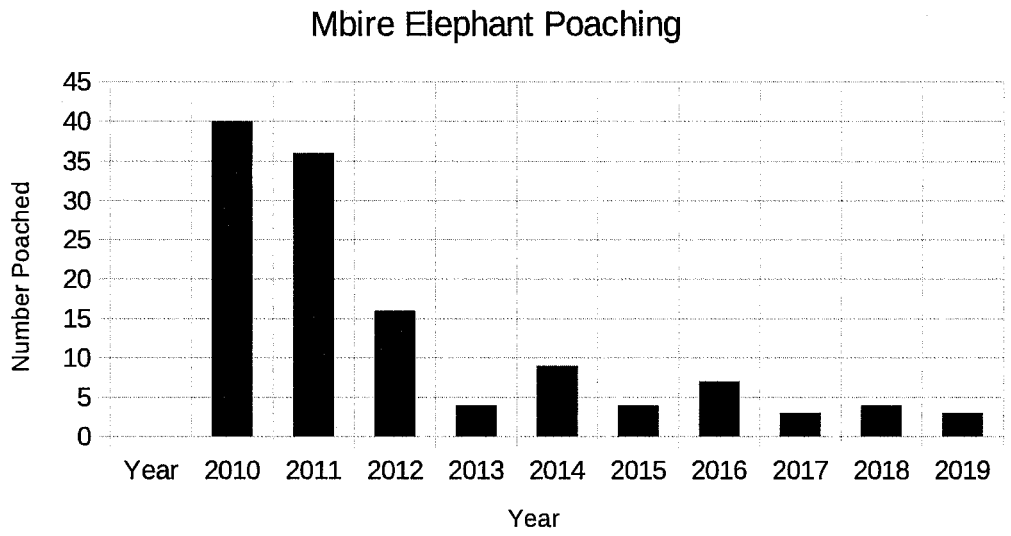

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

CAMPFIRE Association

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

RCVD APR 5 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
EDMOND	OK	73012	OKLAHOMA	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) 03/15/2018

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

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

TARIQ SATTAR, (b) (6) [redacted]

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

(No) Yes

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

N/A

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   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: GWAI I SMALL SCALE FARMERS ASSOCIATION
   LOCATION STATS: S19*12,583 E027*49,331
   NEAREST CITY; BULAWAYO

   b. Date wildlife was hunted:
   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
BELMONTY 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 ACTIVITES.

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 (b) (6) 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).

Zimbabwe Parks and Wildlife Management Authority

CITES PERMIT/CERTIFICATE ZW/4106/2017

NP CITES FORM 2

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

Permit/Certificate No ZW/4106/2017

[X] Export
[ ] Re-Export
[ ] Import
[ ] Other

Original

2. Valid Until: 31-07-2017

3. Importer (name and address): MR TARIQ SATTAR

4. Exporter (name, address and country Zimbabwe
TAXIDERMY ENTERPRISES
4 JOSIAH CHINAMANO ROAD
BELMONT
BULAWAYO
ZIMBABWE

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

5a. Purpose of transaction (see reverse): H

5b. Security stamp no. 129582G

6. Name, address, stamp and country of Management Authority

Zimbabwe Parks and Wildlife Management Authority

6a. Declaration by Exporter or Agent
I hereby declare that I am aware of the provision of the Convent
Statutory Instrument 76 of 1998, for the purpose of Exporting / I
the Wildlife listed below.
The total value of this consignment is:
SUS .....Signature of applican

THIS IS AN EXPIRED PERMIT FROM LAST YEAR AND WILL BE REISSUED AFTER AN IMPORT PERMIT HAS BEEN ISSUED BY US FWS.

THANKS

TARIQ SATTAR

(b) (6) [redacted]

7. Scientific Name	8. Common Name	9. Description o specimens inclu no. (age/sex if li		11c. Mark
Loxodonta africana	*Elephant*	*skin pieces : panel leather tan cut into*	*2016*	*n/a*
Loxodonta africana	*Elephant*	*skin scraps : leathe*	*2016*	*n/a*
Loxodonta africana	*Elephant*	*tails :*	*2016*	*n/a*
Loxodonta africana	*Elephant*	*tusks : capped in ni*	*2016*	*ZW2016 23013 14*
Loxodonta africana	*Elephant*	*tusks : capped in ni*	*2016*	*ZW2016 23014 14*

12. Country of origin:	Permit No	Date o	No	Date:

13. This permit is issued by

Place: Bulawayo Date: 31-01-2017

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 Inspectorate

REGION
P.O. BOX 283 BULAWAYO
TEL 09 - 74000 FAX. 09 - 883388

16. Export endorsement:

Specimens	Quantity	Specimens	Quantity

17. Bill of landing/Air waybill number:

Port of export Date Signature

RCVD APR 5 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
WRITER	ADAM	H	
2. (b) (6) [redacted]	3.a. Alternate Telephone Number	4. E-mail address MATT@GENUSLOGISTICS.COM	

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ENGLEWOOD	CO	80113		US
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach 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)

Atty in fact 3/28/18

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:

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- 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.

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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, Unkwaludhi Hunting 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 I 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

__X__ Individual
___ Partnership
___ Corporation

CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, Adam H Writer (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 as _____ residing at (b) (6) Englewood CO 80113 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 licensed broker as required by thr Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize 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 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 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 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 111.3(b), 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.~~

(b) (6)

* 8/27/18 AW

IN WITNESS WHERE OF, the said (Print name) Adam H. Writer
has caused these presents to be sealed and signed:

(Signature) (b) (6)

(Capacity) Individual / Self **(Date)** 2/27/18

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.:	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:

Country: USA

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
	Buffalo	
CITES II	Crocodile	
	Dik-dik	
	Eland	
CITES *	Elephant	1
	Giraffe	
	Grey Duiker	
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
	*Please report back within 48 hours after shooting.	

On the following farms / hunting concessions: Uukwaludhi 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

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
29/7/14	Elephant	11 kg.		12,5 kg.				0	M.	Uitwaterdrift Cons.			(b) (6)	

*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.

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)

SIGNATURE OF APPLICANT

5. From where are products obtained: Uukwaluudhi Conservancy

6. The following documents are attached as proof of ownership:

(a) Coppy of permit (150107)

(b)

(c)

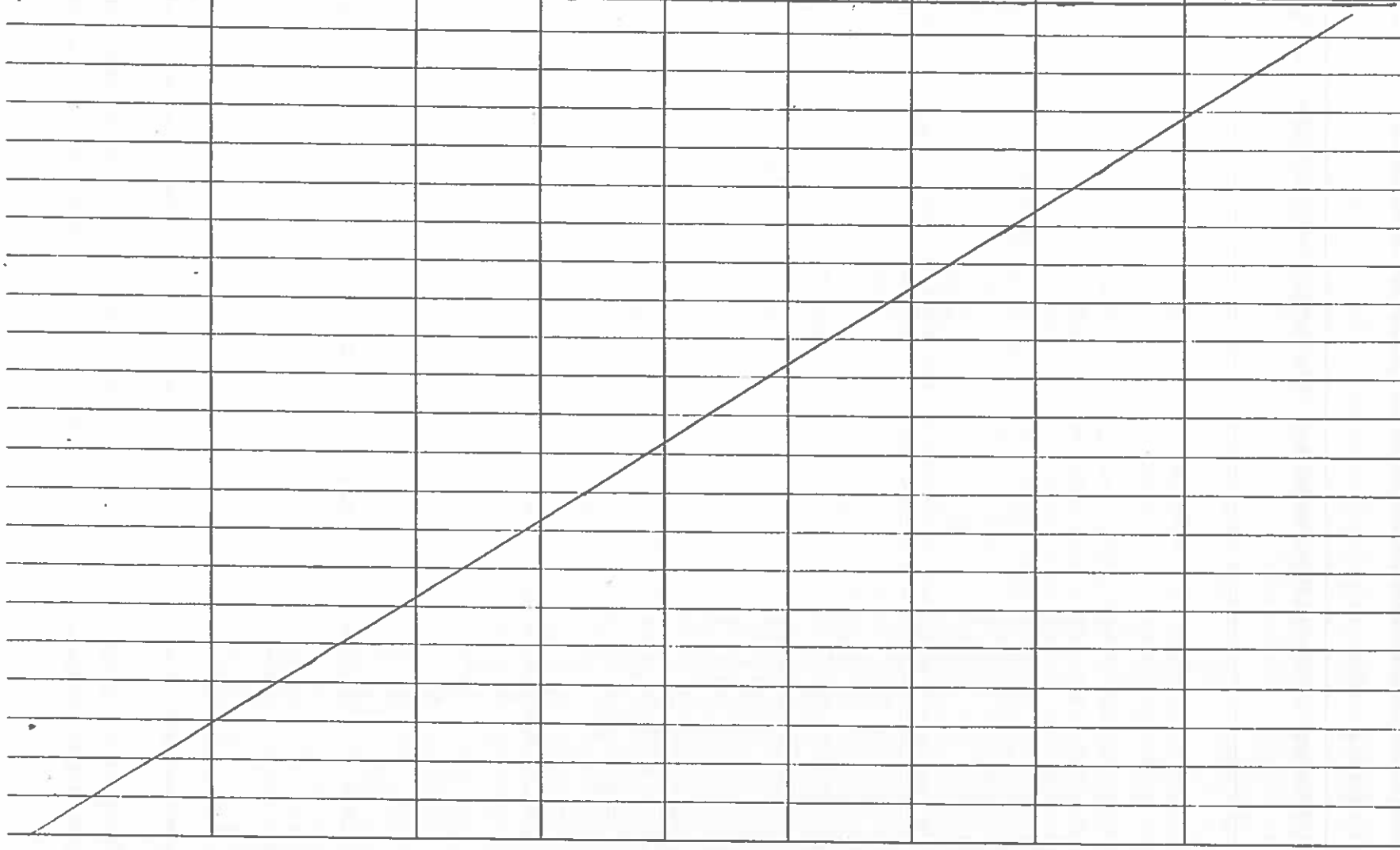
(d)

(e)

01 JUL 2015

DATE

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
2x	Elephant bones							



RCVD APR 10 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
GARDNER	RICHARD		
2. Date of Birth (mm/dd/yyyy) (b) (6) [redacted]	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address MATT@GEMSLOGISTICS.CO.

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
RENO	NV	89511		US
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach 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)

[signature] DITY IN FACT

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 718-790-0816 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, NGOTSHE, 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 TAXIDERMY
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: LIFE FORM TAXIDERMY
Address: 7 ALUMINUM RD
City: BOX 763
State/Province:
Country, Postal Code: 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: 4/4/18

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

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

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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) [redacted]

CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS. That, Richard M. Gardner (Full Name)

Residing at, (b) (6) [redacted] Reno, NV 89511

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, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize 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 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 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 the power shall in no case have any force or effect after the expiration of 2 years from the date of its execution.

Pursuant to 19 CFR 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): (b) (6) [redacted] Date: 4/18/16

WITNESS: (b) (6) [redacted] Date: 4/18/16

PERMIT / CERTIFICATE 170906

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 Monroe Gardner
(b) (6) [redacted]
Reno
NV 89511

3a. Country of import USA

4. Exporter / Re-exporter (name, address and country)
Lifeform Taxidermy
7 Aluminium Road
Box 763
White River
SOUTH AFRICA

5. Special conditions Invalid without attached conditions (annex B page 2)

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) H

5b. Security stamp No. 1370626

	7.a 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.a Elephant Loxodonta africana	9. Skin panels leather tan	10. IIw	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.a Elephant Loxodonta africana	9. left ear, front & back panels leather tan	10. IIw	11. (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.a Elephant Loxodonta africana	9. right ear, front & back panels leather tan	10. IIw	11. (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.a	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

MPUMALANGA TOURISM & PARKS AGENCY
PBAG X11309 NELSPRUIT 1200

13. THIS PERMIT / CERTIFICATE IS ISSUED BY: K D Makaringe

2018 -03- 27

Nelspruit
Place

22 March 2018
Date

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT

Block	Quantity
A	
B	
C	
D	

15. Bill of Lading/Air Waybill Number

Port of Export / Date / Signature / Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621)

PERMIT / CERTIFICATE 170906

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt: Commenced 22/05/2017 Terminated 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 (MPB)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)
X								

Post Permit To (mark correct block with X)

PROFESSIONAL HUNTER
Name: E.P. ALBERTS
Business Address: 70 BOOYSEN STR
MODIMOLLE
Code: 0510
I.D. No: 7007085005087
PH Permit No: 934/2017
Date: 28/5/17 Signature:

CLIENT
Name: RICHARD MONROE GARDNER
Permanent Postal Address: [redacted]
NEVADA, RENO
Code: USA 89511
Passport No.: [redacted]
Tel/Fax:
Date: 28/5/17 Signature: [redacted]

HUNTING OUTFITTER
Name: E.P. ALBERTS
Business Address: 70 BOOYSEN STR.
MODIMOLLE Code: 0510
I.D. No: 7007085005087
Tel No: 0799693360 Fax
H.O. Permit No: 936/2017
Date: 28/5/17 Signature:

Farm Name / Registration No:	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 ♂	Sex ♀	Part of Trophy to be Exported
VERGELEGEN	NKOTSHE	J.M. QUELLHORST	OP1968/2017	22/05		ELEPHANT	1	✓		2 x TUSKS, 4 x FEET, 4 x NAILGUARDS, 1 x PANEL, 2 x EARS
						BUFFALO	1	✓		SKULL/HORNS, CAPE (FOOTMAT)
						NYALA	1	✓		SKULL/HORNS, SKIN/MOUTH
						WARTHOG	1	✓		TUSKS
					28/05	JACKAL	1	✓		SKULL/TAIL/PAW

COPIES. Client — 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 — Remain in book

Address to which trophies are to be sent:
LIFE - FORM
Code:
Country: Trophy Export Date (Estimate):

EZEMVELO
KZN WILDLIFE

ORDINARY PERMIT

Fee: R 1 100.00 Permit No: OP 1968/2017
Receipt No: 1952/2017 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 Monroe Gardner
c/o"KwaZulu Private Game Reserve"
P.O.Box 591
Pongola
3170

Residential Address
c/o"KwaZulu Private Game Reserve"
Vergelegen Fam
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.M Gardner (b) (6) Reno
Nevada,89511
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 20 (b) (6)

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 Website: www.kznwildlife.com

EZEMVELO KZN WILDLIFE

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

(b) (6)

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. Website www.kznwildlife.com

EZEMVELO KZN WILDLIFE

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 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

(b) (6)

for CHIEF EXECUTIVE

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

Fw: [EXTERNAL] Notice of Representation for Permit # 85588C

Nelson, Emma G <emma_nelson@fws.gov>

Thu 7/9/2020 8:59 AM

To: Management Authority, FWHQ <ManagementAuthority@fws.gov>

1 attachments (445 KB)

Gardner,RichardNoticeofRep.pdf;

Forwarding for a response.

From: Aimee Korver <permits@conserva onforce.org>
Sent: Wednesday, June 24, 2020 1:57 PM
To: Nelson, Emma G <emma_nelson@fws.gov>
Subject: [EXTERNAL] No ce of Representa on for Permit # 85588C

Ms. Nelson,
Please find the attached Notice of Representation for applicant, Richard Gardener.
Mr. Gardener hunted an Elephant in South Africa, Permit # 85588C. I believe this permit may have been issued- and i am not sure that you are aware that a portion of his trophy did not get shipped.
Please let me know the status of this application.
Please let me know that you have received these documents and if you have any questions.

Aimee Korver
Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200
Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a Permit to Import a threatened-listed African Elephant Trophy from South Africa.

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

I also request that this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservationforce.org

(b) (6) [redacted]

RICHARD GARDNER

6/18/2020

DATE

Form 3-200-20

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

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
SWAN	JOEL	R	
2. Date of Birth (mm/dd/yyyy) 2. Telephone Number: (b) (6) [redacted]	3.a. Alternate Telephone Number	4. E-mail address: MATT@GENUSLOGISTICS.ca	

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes): (b) (6) [redacted]				
1.b. City: Lubbock	1.c. State: TX	1.d. Zip code/Postal code: 79407	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

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)

Atty in fact 3/28/17

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, BWABWATA EAST CONCESSION

   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
KALEMBEZA 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: Kalemberza Region
City: Katima Mulilo
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: 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.:		2165011

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.R. Sinton

Residential Address:

Country: U.S.A

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

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
I	Crocodile	
	Dik-dik	
	Eland	
II	Elephant	1X
	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	1X
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
I	Cheetah	
I	Leopard	
II	Lion	
	Other	
*	Report back within 48hrs after hunt	

on the following farms / hunting concessions: Bwabwata East Conservancy

Guided by (name of guides): K. Stumpf & F. Beukenhaut

MINISTRY OF ENVIRONMENT & TOURISM
R. Hebes R. Hebes
ISSUING OFFICER'S NAME AND SIGNATURE
UNDER THE AUTHORITY OF THE MINISTER
PURSUANT TO SECTION
OF THE NATURE CONSERVATION
ORDINANCE, NO. 4 OF

Official MET date stamp

IMPORTANT: This permit is not valid if altered in anyway

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

Date	Species	LH*	LB*	RB*	Total	RW*	Age	Male/ Female	Farm Name	Farm No	Signatures: Farm owner	Signatures: Hunter	Signatures: Professional hunter / Master hunting guide / Hunting guide
15/10/17	Elephant					±	40	♂	Kwabwata East Concession		K. Stumpf	(b) (6)	
G.P.S. Co-ordinates.													
S.	17°49'42,5"												
E.	23°11'00,8"												

*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 hunding 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 I 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) [redacted]
Partnership 141.32. C.R.
___ Sole Proprietorship

___ Individual
___ Partnership
___ Corporation

CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, Joel Ryan Swan (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) [redacted] Lubbock, TX 79407 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 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, steed 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 merchandize 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 merchandize; to receive any merchandize 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 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 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 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) Joel Swan
has caused these presents to be sealed and signed:

(Signature) (b) (6) [redacted]

(Capacity) _____ (Date) 5/22/18

WITNESS _____

Barry, Anna <anna_barry@fws.gov>

Re: [EXTERNAL] PRT- MA85607C-0 -- Joel Ryan Swan

2 messages

MacDonald, Tim <tim_macdonald@fws.gov> Fri, Oct 12, 2018 at 11:51 AM
To: Cindi.Rulon@procargousa.com, Anna Barry <anna_barry@fws.gov>

The permit has been assigned to Miss Anna Barry.

I am including her in this email so you have her email address. I would recomment contacting Miss Barry using email, she can respond to your request more easily. However if you feel you need to speak directly to Anna she can be reached at 703-358-1976

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 Fri, Oct 12, 2018 at 8:52 AM Cindi Rulon <Cindi.Rulon@procargousa.com> wrote:

> Hi Tim,
>
> Can you tell me who the above application is assigned to?
>
> Best Regards,
>
> *Cindi Rulon*
>
> Hunting Trophy Dept.
>
> **Pro Cargo USA**
>
> 15619 Morales Rd
>
> Houston TX 77032
>
> DIRECT- 281-220-3176
>
> Main Tel # 281-590-5500
>
> Direct FAX 281-664-4440
>
> All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

Cindi Rulon <Cindi.Rulon@procargousa.com> Fri, Oct 12, 2018 at 11:55 AM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>, Anna Barry <anna_barry@fws.gov>

Thank you, Tim.

I just need to mail more info to the proper person!!

Best Regards,

Cindi Rulon

Hun ng Trophy Dept.

Pro Cargo USA

15619 Morales Rd

Houston TX 77032

DIRECT- 281-220-3176

Main Tel # 281-590-5500

Direct FAX 281-664-4440

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From: MacDonald, Tim [mailto:tim_macdonald@fws.gov]
Sent: Friday, October 12, 2018 10:52 AM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>; Anna Barry <anna_barry@fws.gov>
Subject: Re: [EXTERNAL] PRT- MA85607C-0 -- Joel Ryan Swan

[Quoted text hidden]

Barry, Anna <anna_barry@fws.gov>

Re: [EXTERNAL] PRT- MA85607C-0 -- Joel Ryan Swan

3 messages

MacDonald, Tim <tim_macdonald@fws.gov> Fri, Oct 12, 2018 at 11:51 AM
To: Cindi.Rulon@procargousa.com, Anna Barry <anna_barry@fws.gov>

The permit has been assigned to Miss Anna Barry.

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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

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Cindi Rulon <Cindi.Rulon@procargousa.com> Fri, Oct 12, 2018 at 11:55 AM
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15619 Morales Rd

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Main Tel # 281-590-5500

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From: MacDonald, Tim [mailto:tim_macdonald@fws.gov]
Sent: Friday, October 12, 2018 10:52 AM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>; Anna Barry <anna_barry@fws.gov>
Subject: Re: [EXTERNAL] PRT- MA85607C-0 -- Joel Ryan Swan

[Quoted text hidden]

Cindi Rulon <Cindi.Rulon@procargousa.com> Fri, Nov 16, 2018 at 2:43 PM
To: Anna Barry <anna_barry@fws.gov>

Dear Anna Barry,

I am checking to see if you have enough informa on regarding the elephant applica on for Joel Swan.

Please advise if there is anything more needed.

Best Regards,

Cindi Rulon

Hun ng Trophy Dept.

Pro Cargo USA

15619 Morales Rd

Houston TX 77032

DIRECT- 281-220-3176

Main Tel # 281-590-5500

Direct FAX 281-664-4440

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

---

From: Cindi Rulon
Sent: Friday, October 12, 2018 10:55 AM
To: 'MacDonald, Tim' <tim_macdonald@fws.gov>; Anna Barry <anna_barry@fws.gov>
Subject: RE: [EXTERNAL] PRT- MA85607C-0 -- Joel Ryan Swan

Thank you, Tim.

I just need to mail more info to the proper person!!

Best Regards,

Cindi Rulon

Hun ng Trophy Dept.

Pro Cargo USA

15619 Morales Rd

Houston TX 77032

DIRECT- 281-220-3176

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From: MacDonald, Tim [mailto:tim_macdonald@fws.gov]
Sent: Friday, October 12, 2018 10:52 AM

To: Cindi Rulon <Cindi.Rulon@procargousa.com>; Anna Barry <anna_barry@fws.gov>
Subject: Re: [EXTERNAL] PRT- MA85607C-0 -- Joel Ryan Swan

The permit has been assigned to Miss Anna Barry.

[Quoted text hidden]
[Quoted text hidden]

RCVD OCT 18 2018 LB

No Check

John Rulon CHB
15619 Morales Rd.
Houston, Texas 77032
281-220-3158

October 12, 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia
22401-3803
Attn: Anna Barry
RE: PRT- MA85607C-0 Joel Ryan Swan

Dear Anna;

We refer to the above referenced permit application for an elephant that was submitted on 4/10/18.

The permit application that was originally submitted did not contain answers to question 9 parts a, b and c. We have obtained the information and wish to submit it and have it incorporated into the original application under consideration.

9a. A population study was recently completed by the Ministry of Environment and Tourism. Their findings were that the population of elephants in 1975 was 7,500 and in 2017 the population was 22,700 which represents an annual growth of 4.5%. Additionally, the report estimated that the country can only support 22,000 elephants. Overpopulation will result in destruction of habitat and more conflicts with humans. Therefore the population will support the hunting that is being done and will even require additional relocation efforts or hunting to maintain recommended population levels.

9b According to the outfitter, I paid a rate of $55,000. Over 50% of the funds are reinvested into the community are to employ anti-poaching units, arm and train those units and provide employment to locals and provide water points for wildlife to utilize.

9c. The funds go to the people of the Mashi Conservancy to provide income and support the financial needs of the conservancy. The conservancy, working with the outfitter, established work programs and employment for over 25 people who otherwise would have had very little opportunity or income. These opportunities allow people to earn a living working in the safari industry versus turning to poaching and illegal hunting of all species, including elephants for revenue.

Hopefully, with this additional information, you will be able to process and approve the permit application. Should you need additional information, please contact the undersigned.

Sincerely,

John Rulon CHB

RCVD OCT 18 2018

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

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.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b) (6) [redacted]

Cell Phone (b) (6) [redacted]

Email address (b) (6) [redacted]

x Individual

KNOW ALL MEN BY THESE PRESENTS: That x Joel Ryan Swan (Full Name of Person), residing at x (b) (6) [redacted] Brady, TX 76825 hereby constitutes and appoints each of the following persons - John Rulon CHB 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, steed 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 on 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 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 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 John Rulon CHB , who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

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 I 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

IN WITNESS WHERE OF, the said (Print name) x Joel Swan has caused these presents to be sealed and signed:

(Signature) x (b) (6) [redacted]

((Date) x 8/12/18

RCVD APR 13 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Salt Lake	Utah	84124	Salt Lake	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 [illegible] to the best of 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)

Sign[illegible] photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

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

Roger Knight (b) (6) [redacted]

(b) (6) [redacted]

(Lowercase J)

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 africana male common: 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:
   Save Valley conservancy, Sango province: Masvingo nearest town Masvingo

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Zambezi 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:
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: [redacted] 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).

MacDonald, Tim <tim_macdonald@fws.gov>

FWS Permit

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Fri, Sep 27, 2019 at 2:06 PM
To: (b)(6)

Dear Roger,

U.S. Fish and Wildlife Service Prt 85759C

On 04/13/2018 an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 85759C**. At the me of the applic aon' s submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

Form 3-200-20

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

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Stevens	Danny	SHANE	

2. (b) (6) [redacted]

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Austin	TX	78732	TRAVIS	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.

(b) (6) [redacted] 04/10/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

(b) (6) [redacted]

Austin, TX 78732

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

SHANE STEVENS

(b) (6) [redacted]

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

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.

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: (b) (6) 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).

9-16-2019

Dr. Mary Cogliano, Chief
Branch of Permits, MS: IA
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

RE: CITES Permit no. 85995C

Danny Shane Stevens

Dear Dr. Cogliano,

As an avid hunter and outdoorsman, I want to thank you for the time you have served within FWS for the greater good of all outdoor enthusiasts. Your background and service is truly admirable. Altice Braxton referred me to you several months back and I have a challenge on deciphering the e-mail for you in that voice message. It is either marycogliano@fws.gov or so I am sending this to both in hopes you will receive my letter.

I initially submitted for a CITES ivory import permit in March or April of 2018. We received response on April 17, 2018 and the e-mail read as follows:

"***For questions please send an email directly to managementauthority@fws.gov ***

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 04/16/2018; check number 2062 accompanied the application for AFRICAN ELEPHANT. Your application has been assigned the following PRT identification number: MA85995C-0While 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 notification to make any inquiries. Should you have additional information that you need to provide to our office pertaining to the current request, we ask that you call our office first at 800-358-2104 or email managementauthority@fws.gov to obtain further instructions."

We have attempted contact on a few occasions with little success and I am hoping to gain your audience. My purpose for wanting to speak with you is two fold. First, I would like to gain approval to import the elephant I harvested in Zimbabwe. Secondly, I have learned so much through the time I spent in Africa that I feel compelled to share some of my insights with you or whomever in a decision-making capacity at FWS. What I thought I knew from all I have learned about African conservation here in the US was no where close to accurate. By spending time on the ground with the landowners, locals, guides and outfitters I have completely changed my opinions on how conservation "should" be handled

in Africa. In two cases, we as Americans have done a disastrous disservice to certain wildlife populations in Africa.

First and foremost, let's look at Cheetah in Namibia. I want to preface this with the fact that I have no desire to hunt Cheetah or big cats in general. When I first arrived in Namibia, our PH requested we shoot all cheetah at first sighting. I informed him I was against hunting cheetah as they are endangered and we cannot do that. He explained to me at one point there were hundreds on his ranch. After the ban on the export of Cheetah it deemed the cheetah of no monetary value. In addition, a Cheetah coalition kills a few animals per week. To the rancher in Namibia, this represents between $1,200 and $6,000 in animal value. Ranchers across Namibia began doing what they could to eradicate them since they were a negative financial impact. In addition to hunting them, they also poison them. I think our policy needs to be evaluated on the basis of what Is best in the big picture for the cheetah population.

Secondly, lets look at Elephant. Prior to my first visit to Africa, I was against hunting elephant. That was until I went for the first time and began to understand more about the reality on the ground. The primary reason for the killing of elephants is through poaching or indiscriminate killing of them when they set foot on the farmers crops. I believe they call these PAC elephants. At one camp, they harvested 5 elephants as PAC in 10 days. As I dug into why, there reason once again is MONETARY value. The poachers can poach unchecked as the ranchers cannot afford or do not want to pay for anti-poaching units if they are not protecting a resource that benefits them financially. However, if an elephant is exportable, the value of that bull is around $30,000 and up. Approximately 5K goes to the government for the permit, 2K goes to the nearest village in which the elephant is harvested, and the rest of the money goes back to the outfitter/Rancher. That is substantial profit which is then used for anti-poaching units to PROTECT the elephants. It costs approximately $3 per person per day for an anti-poaching unit. That comes out to $750 per year per person and doing the math for a 10-person anti-poaching unit, the rancher is only looking at $7,500 per year. If the rancher has the monetary benefit, it saves all of the PAC elephants as they are then worth more than their crops and it saves a majority of the elephants from poaching due to having an anti-poaching unit. In addition, the village gets the meat from the elephant and not a single piece is wasted. The $2,000 received plus the meat gives the village enough incentive to stop shooting elephants with their small caliber weapons.

In short, I am currently of the opinion that the US policy on imports has done the EXACT OPPOSITE of its intended impact. I am open to the possibility that I have received a limited scope of information from the Ranches, locals and outfitters with whom I have been with in Africa. I would like to have a discussion regarding this if at all possible. I will be in DC Sept 21st through the 26th and would love to meet.

I can be reached on my cell at (b) (6) or simply e-mail me at (b) (6)

Sincerely,

D. Shane Stevens

9-16-2019

Dr. Mary Cogliano, Chief
Branch of Permits, MS: IA
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

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I can be reached on my cell at 512-699-2815 or simply e-mail me at sstevens@usdentalsolutions.com

Sincerely,

(b) (6)

D. Shane Stevens

RCVD APR 17 2018

10 April, 2018

(b) (6)
Irma, WI 54442

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,

(b) (6)

Steven F. Metzenbauer

RCVD APR 17 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.

You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link:.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Metzenbauer	Steven	F.	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f.Country
Irma	Wisconsin	54442	Lincoln	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) [redacted] 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).

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 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 F. Metzenbauer (b) (6) [redacted]

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

No ~~Yes~~

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
      - 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 – Matatabeland 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 habitant 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 (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.

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).

Section E-Question #7

010 001086

NP/CITES Form 10

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

PCA: .....
PCA 172
Amount paid $250
Rec No. 1129044
Date 16/01/18

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

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

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

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

of ..... Deka Tail .....

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	Girraffe (m)		1	Porcupine		2
Bushbuck m		3	Impala(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	XXXXXXXXXXXXXXXXXXXXXX		
Grysbok(m)		5	Lion (m)		2			

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

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

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

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

Date stamp of authority which issue the permit

MANAGEMENT AUTHORITY CONSUMPTIVE SERVICES
16 JAN 2018
HEAD OFFICE
P O BOX CY 140 CAUSEWAY HARARE
TEL: (04) 707 606/9/ 79273...9

..... 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.)

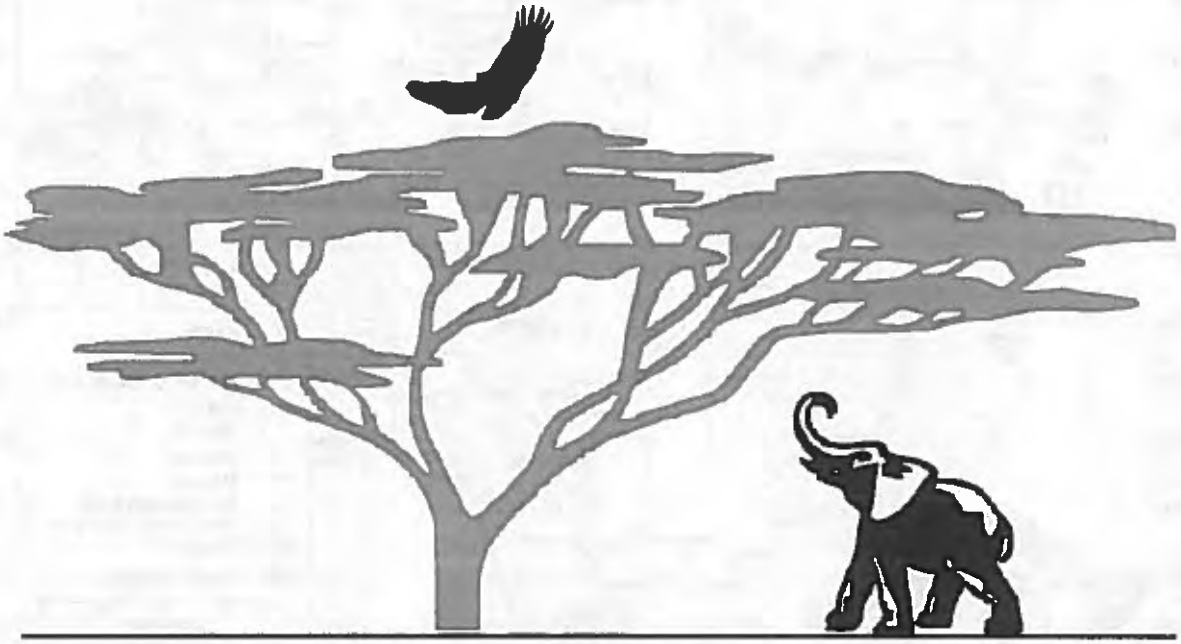
Printed by Printflow (Private) Limited.

Section E - Question # 9-a
Attachment consists of 4 pages

2017 GAME CENSUS FOR

HWANGE NATIONAL PARK AND SURROUNDING

AREAS

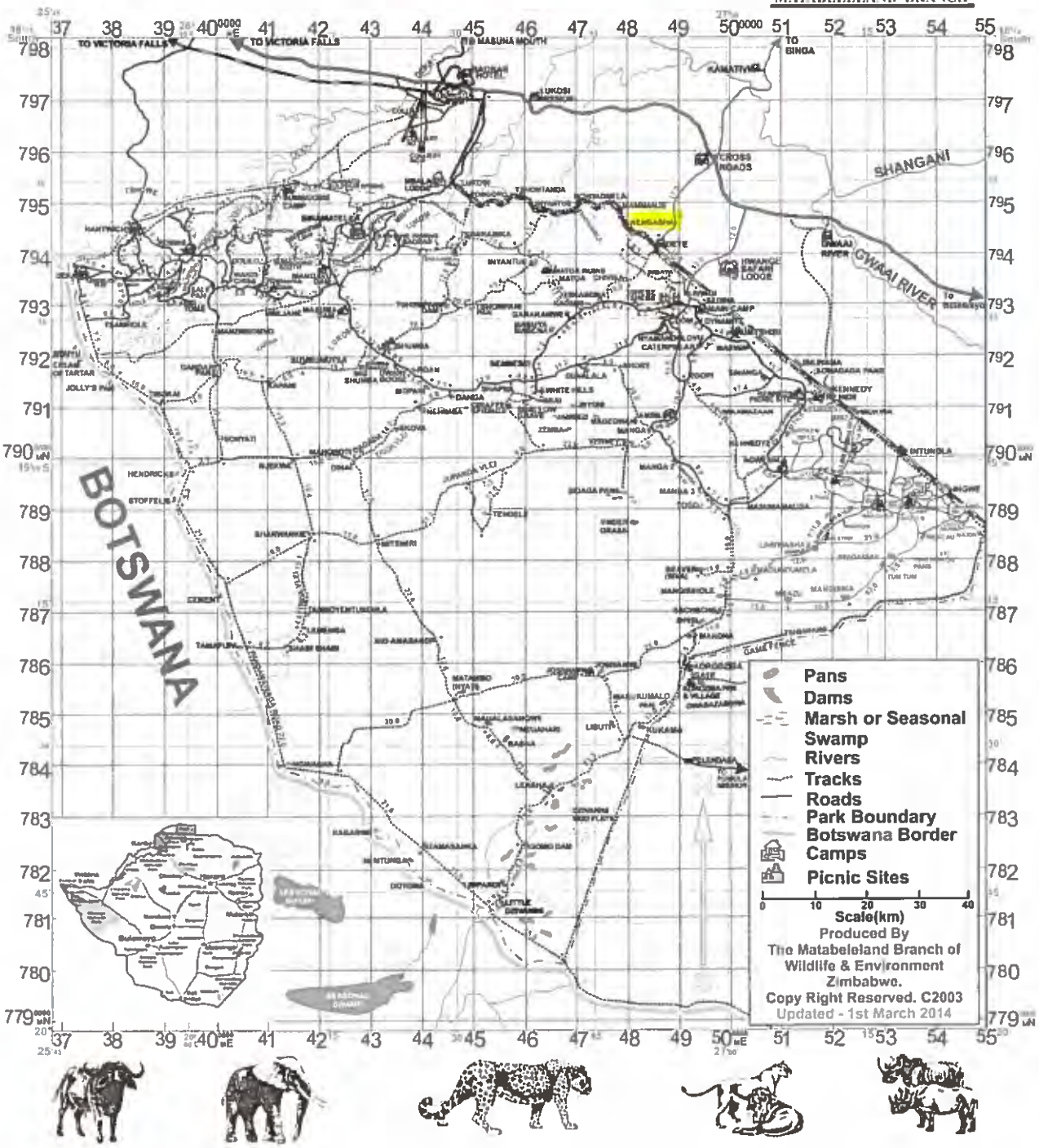


MATABELELAND BRANCH

Compiled and Produced by Wildlife & Environment Zimbabwe
Matabeleland Branch

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
Total	4576	12652	16867	5708	39803

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.

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								
Duiker, 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

29 August, 2019

(b) (6)
Irma, WI 54442
Phone (b) (6)
Email: (b) (6)

RCVD SEP 10 2019

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

Ref: Elephant permit import status

Dear U.S. Fish and Wildlife Service:

Back in 10 April, 2018 I submitted an application for the importation of a Zimbabwe elephant. Attached is a copy of my cover letter that accompanied the submittal. Since the submittal, I was able to find out that the agency on 20 April, 2018 assigned case #MA86417C-0 to the application. Other than a phone call by myself, I have heard nothing at all from your agency regarding the application. My application was submitted prior to the actual hunt and in September, 2018, I did in deed harvest an elephant in Zimbabwe.

My application was submitted with the appropriate information directly from the Zimbabwe Parks and Wildlife which included the Zimbabwe Parks and Wildlife hunting permit which shows their desire to reduce the elephant population by 3, the Zimbabwe 2017 game census, a map of hunted area, and a census showing an elephant population increase from 9,283 in 2000 to 23,681 in 2017. To assure that the hunt was done appropriately, ethically, and legally, we were accompanied each day by a Zimbabwe Parks and Wildlife Ranger. No issues or concerns developed during or after the hunt. The trophies themselves now sit in storage in Zimbabwe awaiting your approval to import. Is it possible to give me any status update on my application?

Sincerely,

(b) (6)

Steven F. Metzenbauer

10 April, 2018

(b) (6)
Irma, WI 54442

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,

(b) (6)

Steven F. Metzenbauer

RCVD MAY 1 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a Last Name	1.b First Name	1.c. Middle Name/Initial	1.d. Suffix
FRAZIER	WALTER	M	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Scott Depot	WV	25560	Putnam	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) 2/27/2018

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)?

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

   Northwest 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:
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?

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 eatable! 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 monies 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 (b) (6) _____ 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.
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RENEE SNIDER

April 23, 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 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
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.

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: JOHN CHILDS

Date: 3/30/2018

RCVD MAY 1 2018

Form 3-200-20

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

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

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Chilton	John	Philip	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6) [redacted]			

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

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

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (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) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Dallas	Texas	75254	Dallas	USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties

(b) (6) [redacted] 04/10/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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

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

---

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

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

   Attorneys for Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   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:	The Yellow Shark Holdings, Windmill Park Unit 7,
City:	DANTE STREET, PROSPERITA, WINDHOEK
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**). 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 understa[redacted] United States, cannot be re-exported.

    Applicant's signatu[redacted] 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).

[EXTERNAL] Supplement to Permit # 48613C John Chilton - elephant Namibia

Aimee Korver <permits@conservationforce.org>

Thu 7/2/2020 1:46 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; (b) (6) (b) (6) peter@africatrophyhunting.com <peter@africatrophyhunting.com>

3 attachments (7 MB)

#48613CJohnChiltonSupplement3.pdf; #48613CJohnChiltonSupplement1.pdf; #48613CJohnChiltonSupplement2.pdf;

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Amy,

Please see the attached supplements to the import permit application for Permit #48613C for applicant John Chilton.

Please let me know that you have received these documents and if you have any questions.

Thank you

Aimée *Korver*

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERC, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
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SHANE MAHONEY
RENEE SNIDER

July 2nd, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine – Zimbabwe and Namibia
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-MAIL: Amy_Brisendine@fws.gov

RE: PRT # 48613C, Applicant John Chilton, Elephant from Namibia
Supplement to the Import Permit Application

Ms. Brisendine:

This is a supplement to the existing application, PRT # 48613C, for John Chilton for his elephant trophy from Namibia

Answers to Question 9 of the import permit application:

9a. Do you have any information regarding the population status or trend data on the species hunted?

Please reference the document from the Southern African Development Community at the Kasane Elephant Summit from 2019 which we have provided. Where the president of the Republic of Namibia states that the Namibian elephant population is stable and secure. Also we have previously provided the Namibian National Elephant Management Plan that we also ask you reference.

9b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Trophy fees for this hunt were $38,000 US. Please see the attached Operator Enhancement Report detailing how trophy fees for this area are used.

9c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please reference the Operator Enhancement Report provided – in it you will find at the end this statement

"We built camps in Na Jaqna, Ondjou, and Kabulabula. Thormahlen & Cochran donate all the camps to the Conservancies. We deliver all the meat that we hunt, to the conservancies, and donate to every local school the blue bags. We are building roads, and are responsible for the water and electricity supply for the camps. We employ the local community as staff and currently employ 5 to 6 conservancy members as staff. We are also responsible for the training of the staff to be able to serve the overseas clients. To date we have 32 community members employed in the various camps. We also have social

responsibilities towards the conservancies: we built a school hostel, a community hall, drilling of waterholes, making cutlines, building roads etc.
We are buying protective clothing to the game guards and uniforms for the personnel on an annual basis and opened another drilling hole for N$460,000.

Please refer to these documents and the hundreds of pages of information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by the government authorities in Namibia, outfitters, and others, in making a positive enhancement finding and issuing an import permit for this lion trophy.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. John Chilton w/attachments

Enclosures:
a. Operator Enhancement Report- Mangetti NP
b. Hunting Permits and CITES paperwork
c. Statement by his Excellency Dr. Hage G. Geingob, President of the Republic of Namibia and Chairman of the Southern African Development Community at the Kesane Elephant Summit

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.:	173618
VALID FROM:	14.02.17
VALID TO:	27.02.17

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: J.P Chillo

Residential Address:

Country: U.S.A

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
	Buffalo	
CITES I	Crocodile	
	Dik-dik	
	Eland	1X
CITES II	Elephant	1X
	Giraffe	
	Grey Duiker	1X
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	1X
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
	*Report back in the zebras of the hunt. *No female hunting. *Only male, horn length 40 cm or more	

on the following farms / hunting concessions: Mangetti National Park

Guided by (name of guides): Alfeus Iipinge (Snr), Alfeus Iipinge (Snr), E. Cubis, A.M. Alberts & P Ikanyeleko

Cashier receipt No.: 2142326

Issued on 22.02.17

Amount received: N$

MINISTRY OF ENVIRONMENT & TOURISM
Alfeus R. Iipinge
(ISSUING OFFICER (NAME & SIGNATURE))
Authorizing officer
UNDER THE AUTHORITY OF THE MINISTER
POHAMBA SHIFETA IN TERMS OF SECTION 78 (1) OF THE NATURE CONSERVATION

Official MET date stamp

22 -02- 17

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

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			
[illegible]	Blesbok							8	Male	[illegible]		[illegible]	(b) (6)	
[illegible]	Springbok							8	Male	[illegible]		[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 ma conduct the hunt.

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

PERMIT / CERTIFICATE No.

0055834

Original

☐ EXPORT
☐ RE-EXPORT
☐ IMPORT
☐ OTHER:

2. Valid until: 31/12/2016

3. Importer (name and address)

(b) (6)

4. Exporter / Re-exporter (name,address and country)

Signature of the applicant

5. Special conditions

All imports and exports remain subject to verterinary 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 ENVIROMENT AND TOURISM
Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp No.: 58125

	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. 22/20 (2015)
B	7./8. Loxodonta africana African elephant	9. skull, tail, jaw, belly skin 4x feet & 2x ears	10. II W	11. 10 item	11a. /
C	7./8. Loxodonta africana African elephant	9. 2x leg bones, 2x skin panels & trunk	10. II W	11. 5 item	11a. /
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 progated for commercial purposes
★★★ for pre-Convention specimens

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA

13.THIS PERMIT IS ISSUED BY: J. Shadi

Windhoek — Place

08/04/2016 — Date

08 APR 2016

Private Bag 13306 • Windhoek
Tel: 284823 • Fax: 258861

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Landing / Air Waybill Number:

Block	Quantity
A	
B	
C	
D	

Port of Export / Re-export | Date | Signature | Official stamp and title

Original

Namprint: 2308

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: Peter Thormahlen

   a. Years in business: 20

   b. Name of company conducting hunt: Thormahlen & Cochran Safaris

   2. Name of concession: **Mangetti NP** **Size in km²: 30,000 ha**

   a. Land tenure: __ Government lease X__ Community _ Private ranch __ Private conservancy

   b. Length of concession agreement: 4 years Can it be renewed? __ Yes _X_ No

   c. Length of renewal, if applicable: Auction every 4-5 Years

   d. Estimated total amount received in trophy fees last year, if applicable: $400,000

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: Government Concession – none of the above required

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Nearest town is Rundu. Map, attachment 1,

   g. If the concession borders a national park, please provide the park name: _____Concession is Mangetti National Park_____

h. Description of general and distinctive habitat features and any water features: Biotype is made up of Miombo Forest area

3. Are there any communities living in the concession? Yes _X_ No

   a. If so, estimated number of people or villages in the concession?

4. Are there communities bordering this concession? X_ Yes __ No

   a. If so, estimated number of people or villages around the concession? Commercial Farms, Kavango Tribe

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	**abundance**	250	stable	MET Game Count Surveys
Lion	average	0	stable	MET Game Count Surveys
Leopard	abundance	100	upwards	MET Game Count Surveys

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Hippo	abundance	0	upwards	MET Game Count Surveys
Crocodile	abundance	0	upwards	MET Game Count Surveys
Roan Antelope	abundance	0	upwards	MET Game Count Surveys
Kudu	abundance	100	upwards	MET Game Count Surveys
Sable Antelope	abundance	0	upwards	MET Game Count Surveys
Prey species	Abundance: zebra, giraffe, baboon, Steenbuck, grey duiker, impala, reedbuck	2000+	upwards	MET Game Count Surveys

Wildlife monitoring in the Park is done by Ministry of Environment & Tourism (MEFT)

6. Total employment number: __5_____

   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	4	2
Trackers	4	3
Anti-poaching scouts/rangers	0	
Other anti-poaching	Namibia Game Department - MET	
Cooks/housekeepers	2	2
Community coordinators		
Managers	1	1
Biologists		
Others: _____	2	2

7. Number of staff employed in the off-season: 13 - anti-poaching excluded.

   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	0		
Managers	2	1	2014-2017
Maintenance	2	2	2014-2017
Road opening/construction			

Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: National Park -MET is doing Anti-Poaching

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both

   c. Months during which anti-poaching patrols are conducted: every month

   d. Number of anti-poaching patrols per month: Anti-poaching is done 24/7 in the National Park by Park Officials

   e. Description of anti-poaching equipment, vehicles, etc.: Patrol 4x4 cars and on foot.

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Namibian Government - MET

   g. Do you offer rewards to poaching informants leading to arrest? __ Yes _X_ No

   h. Do you offer rewards to poaching informants upon conviction? Yes _X_ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? The anti-poaching campaign done by Parks personnel

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts				
Equipment				
Vehicles				
Petrol				
Rewards paid				
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered				
Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated				
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered				
Other: _____				

The Game Department does not share information. Poaching is a sensitive issue and therefore no information in this regard is available to us to complete the above table. However, because of all the anti-poaching programs run in the area, poaching of antelope is zero, or so little that we don't know of any incidents.

10. Community investment:[3]

    a. Does the company contribute money or goods/services to local communities? _X_ Yes _ No

    b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? __voluntary and donated by our overseas clients – mostly USA citizens who donates school stationary to schools in the area.

    c. Does the company provide game meat to nearby communities? x_ Yes __ No

    d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: All the game meat hunted by us and as per the allocated quotas of the Minister of Environment and Tourism, go to the local community

       Yearly the following Game is harvested:
       Elephant x 2 @ 4,500 kg per carcass @N$22 / kg = N$198,000
       Kudu x 2 @ 120 kg carcass @N$22 / kg = N$5,280
       Impala x 4 @ 50 kg carcass @ N$22 / kg = N$2,640

       TOTAL = N$205,920

    e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.

       National Park -Park Officials on duty

    f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in?

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

There is a Government Fund that refunds the community for damages.

Species	Damage caused	Consolation paid 2016	Consolation paid 2017	Consolation paid 2018
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____US$_____

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	$1,750	$3,500	$4,000	20 blue bags @ $200 per bag = $4000, or N$55000. Clients donate $200, we will up the bag to the total of $200 with the necessary school or educational supplies, identified by the local schools.0-
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded	$500	$500	$500	
Construction materials donated				
Other: _____				
Other: _____				
TOTALS	$2,250	$4,000	$4,500	

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

Please note: we operate in South Africa and Namibia, and the figures below, is for the whole operation

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 4 2016: 9 2017: 5	2015: 2016: 2017:	2015: 2 2016: 9 2017: 9	2015: 126 2016: 110 2017: 141
Percentage of U.S. clients	2015: 99 2016: 98 2017: 100	2015: 2016: 2017:	2015: 100 2016: 98 2017: 99	2015: 95 2016: 96 2017: 97
Trophy fees paid by U.S. clients	2015: 220000 2016: 495000 2017: 275000	2015: 2016: 2017:	2015: 42000 2016: 225000 2017: 256000	2015: 303 715 2016: 1075 000 2017: 997 375

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: _95%

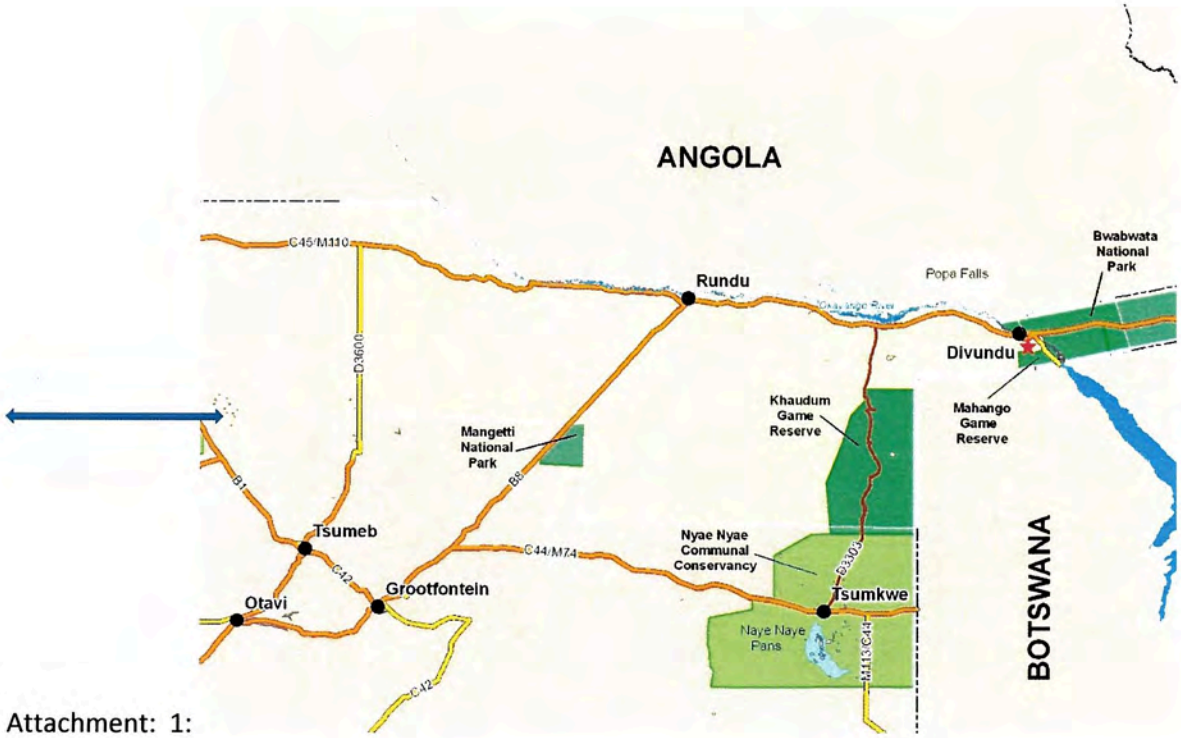
13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

Thormahlen & Cochran operates on other conservancies in Namibia, namely:
Na#Jaqna
Ondjou
Kabulabula
We built camps in Na Jaqna, Ondjou, and Kabulabula. Thormahlen & Cochran donate all the camps to the Conservancies. We deliver all the meat that we hunt, to the conservancies, and donate to every local school the blue bags. We are building roads, and are responsible for the water and electricity supply for the camps. We employ the local community as staff and currently employ 5 to 6 conservancy members as staff . We are also responsible for the training of the staff to be able to serve the overseas clients. To date we have 32 community members employed in the various camps. We also have social responsibilities towards the conservancies: we built a school hostel, a community hall, drilling of waterholes, making cutlines, building roads etc. We are buying protective clothing to the game guards and uniforms for the personnel on an annual basis and opened another drilling hole for N$460,000.

14. I declare that the foregoing is true and correct.

Signature:

Name: _FPJ Thormahlen Title: Mr



Attachment: 1:

REPUBLIC OF NAMIBIA

STATEMENT BY
HIS EXCELLENCY DR. HAGE G. GEINGOB,
PRESIDENT OF THE REPUBLIC OF NAMIBIA AND CHAIRMAN OF THE SOUTHERN AFRICAN DEVELOPMENT COMMUNITY (SADC)
AT THE KASANE ELEPHANT SUMMIT

MAY 07, 2019 **KASANE, BOTSWANA**

Check against delivery

- **Your Excellency Dr. Mokgweetsi Masisi, President of the Republic of Botswana and Chairperson of the Kasane Elephant Summit;**
- **Your Excellencies, Heads of State and Government;**
- **Honourable Ministers;**
- **Your Excellency, Dr. Stergomena Lawrence Tax, SADC Executive Secretary;**
- **Your Excellencies, Members of the Diplomatic Corps;**
- **Media fraternity;**
- **Ladies and Gentlemen,**

I commend our host, My Brother, President Masisi, for convening this Elephant Summit, with objective of creating a common understanding and shared vision towards the sustainable management of our elephants. I also thank all

Heads of State and Government for their presence here today.

Conservation in Namibia has attained major successes. In fact, conservancies manage approximately 19.8% of the total Namibian surface area. By joining large contiguous areas and thereby allowing wildlife to roam freely, environmental restoration has been achieved and healthy wildlife populations sustained.

Namibia's conservation model has enabled expansion of the elephant population from just over 7,500 in 1995 to 24,000 at present. The biggest potential threat to the Namibian elephant population is the loss of habitat due to cyclical periods of drought. Another problem area is fragmentation of range and rising incidences of human-elephant conflict. We are aware that these challenges are not unique to Namibia and exist within all member states. We therefore

welcome the developed Elephant Management and Planning Framework, which will assist Partner States to manage their elephants as one contiguous population through a harmonized approach.

Chairperson,

Your Excellencies,

Conservation generates much required economic returns for rural communities. By the end of 2017, community conservation contributed an estimated 7 billion Namibian Dollars to net national income, facilitating job growth within local communities. With this in mind, Namibia affirms the call for communities to be actively involved in the protection and conservation of environment and biodiversity. We further underscore that programmes to promote conservation of biodiversity must positively

impact the standard of living of rural communities.

Chairperson,

Your Excellencies,

Concerning the trade in elephant specimens, Namibia has fully complied with requirements from the Convention of International Trade in Endangered Species (CITES) and contributed to the development of a rigorous trade control system. As a result, Namibia successfully exported raw ivory between 1999 and 2008, proving that with adequate controls and strict enforcement measures, ivory can be traded legally.

To that end, Namibia has taken note of the ongoing debate and criticism on elephant population management and status for the

Republic of Botswana and affirm our support to the new policies and programmes on elephant population management and sustainable use, which have been developed by us all, as KAZA Partner States.

Namibia continues to exercise strict control over ivory stocks, however, stocks continue to accumulate, by an average of 4.5 percent per annum, primarily through natural mortalities. We express concern over the cost and security implications of holding large ivory stocks and reiterate our favourable stance towards legal international trade of ivory, from which proceeds would be utilized to support elephant conservation and rural conservation programmes.

Chairperson,

I am further pleased to report that Namibia has nearly completed the projects under Phase I and II of the Kavango Zambezi Transfrontier Conservation Area Agreement (KAZA TFCA) and encourage ratification of the Treaty by all five Partner States. I further use this opportunity to call for renewed commitment to resourcing the KAZA Fund, so as to enable the full and timely implementation of our shared objectives.

Your Excellencies,

President Ramaphosa concluded the just ended Africa Travel Indaba with the words "Tourism is the new gold". This is an accurate statement that captures the tremendous potential presented by this sector, which remains largely untapped and brimming with possibilities for accelerated socio-

economic growth and development in our Sub-region. The conservation and sustainable management of our natural resources remain key markets in rekindling economic growth and job creation.

I am on record, having stated that the free movement of people must be facilitated, especially to enable Africans who are traveling within Africa. I therefore reiterate the call for the easing of movement of people across our borders and affirm Namibia's commitment to implementing the KAZA UNIVISA, which has been successfully piloted in Zambia and Zimbabwe since 2014.

I wish to conclude by stating that the Namibian elephant population is secure. The population recovery over the past several years attests to our management efforts. Changing times call for appropriate management strategies to be

developed in order to maintain the historic coexistence between our people and elephants. To that end, Namibia supports the realization of a shared approach towards elephant conservation via the KAZA Agreement, thereby, remaining committed towards a common vision for the management of Southern Africa's elephants.

Thank you.

Form 3-200-20

RCVD MAY 1 2018

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
POWELL	W	DAVID	

(b) (6) [redacted]

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room # or P.O. Box)

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
PALM HARBOR	FLORIDA	34685	PINELLAS	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)

(b) (6) [redacted]

04/25/2018

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. DAVID POWELL (b) (6) [redacted]

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

(No) Yes

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   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:
   NORTHWESTERN REPUBLIC OF SOUTH AFRICA -
   LIMPOPO PROVINCE - NORTH OF ALDAYS - NEAR MORITI

   b. Date wildlife was hunted:

   20 JUNE 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
ES - SAFARIS, MAPUNGUBWE 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: UNIVERAL 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, LOOSING 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 REPLANT TO REPLACE 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 CONSERVATION TO STUDY WILDLIFE FOR FUTURE, INVOLVES DARTING, 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 a calendar year.

Applicant's signature (b) (6) 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:

I'M EMBARRASSED TO SAY "I FORGOT TO ENCLOSE THE PERMIT REQUEST FEE", BUT I DID FORGET. PLEASE POST THIS $100 TO "88193C."

W. DAVID POWELL

THANK YOU,

(b) (6)

Form 3-200-20

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

RCVD APR 05 2018

LB

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

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
WILCOX	Jeffrey	A	Mr.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number
(b) (6)		(b) (6)

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Oakland	California	94619	Alameda	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

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.

Sig[illegible]ermit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

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:

- 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 Address

(b) (6) [redacted]

Oakland CA. 94619

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

JEFF WILCOX

(b) (6) [redacted]

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

(No) Yes

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   b. Sex (if known). African Elephant, Loxodonta, African Bush 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:
   Malapati Communal in South Eastern Lowveld of Zimbabwe bordering the Gona-Re-Zhou National Park in Zimbabwe.

   b. Date wildlife is to be hunted:
   June 9 to June 25, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Thaba Mmoyo Safaris
   P.O. Box 31. Waterpoort 0905 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:
   NA not taken yet.

   b. Date wildlife was hunted:
   NA.

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

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

Thaba Mmoyo 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]:

Malapati Communal Area
Zimbabwe (There is No Physical Address)

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 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: Charlene Janse van Rensburg
Business Name: Trophy Solutions
Address: 11 Sixth Avenue Industrial P.O Box 12043
City: Polokwane
State/Province:
Country, Postal Code: South Africa 0713

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?

I do not have 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

The hunting company is very active in anti poaching efforts for many years.

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

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: [redacted] 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.

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).

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] Re: Prt # 85064C

1 message

Jeff Wilcox (b) (6) > Wed, Oct 2, 2019 at 3:30 PM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>

Tim

Yes that is correct I am withdrawing my application Becaus the hunt was unsuccessful.

Jeff Wilcox

Phone: (b) (6) cell
Email: (b) (6) m

On Oct 2, 2019, at 9:02 AM, MacDonald, Tim <tim_macdonald@fws.gov> wrote:

> Hi Jeff,
>
> As we just discussed on the phone, you are withdrawing your application for a sport hunted elephant, because the hunt was unsuccessful.
>
> Thank you,
>
> **Tim Mac Donald**
>
> **Government Information Specialist**
> **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

RCVD MAY 8 201

Timothy R. Decker
(b) (6)
Apple Valley, California 92307
(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 R. Decker
(b) (6)
Apple Valley, CA 92307

My email address is: (b) (6)

My telephone numbers are:
(b) (6)

Thank you for your attention.

Sincerely,

(b) (6)

Timothy R. Decker

RCVD MAY 8 201

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Decker	Timothy	Richard	

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

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Apple Valley	California	92307	San Bernardino	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) [redacted] 04/24/2018

ase 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)?

Timothy R. 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 l[redacted]ear.

Applicant's signatur[redacted] 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.

X EXPORT

RE-EXPORT

IMPORT

OTHER:

Database Certificate No: 0050579

0050579

Original

2. Valid until: 16/03/2017

3. Importer (name and address)
Timothy Richard Decker
Highveldt Taxidermy
Farm 354, Vlakplaats
Hennopsriver 0023

3a. Country of import: South Africa

4. Exporter / Re-exporter (name,address and country)
K. Grunschloss
P. O. BOX 11908
Windhoek
Namibia

Signature of the applicant

5. Special conditions
Tusks no's: NA 15 0081 24 20 & NA 15 0082 22 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.

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 progated for commercial purposes
*** for pre-Convention specimens

13. THIS PERMIT IS ISSUED BY: J. Shapi

Windhoek — Place

16/09/2016 — Date

1503845 — Security stamp, signature and official seal

14. EXPORT ENDORSEMENT.

15. Bill of Landing / Air Waybill Number: 083 3408 1541

Block	Quantity
A	2
B	20
C	
D	

Hair — Port of Export / Re-export

23/2/17 — Date

2017 -02- 23

Signature

Official stamp and title

Original

Nampint: 2308

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

PERMIT / CERTIFICATE No.

0052553

[X] EXPORT
[ ] RE-EXPORT
[ ] IMPORT
[ ] OTHER:

Original

2. Valid until
13/10/2017

3. Importer (name and address)
Timothy Richard Decker
Hidveldt Taxidermy Farm 56A
Vlakplaats
Hennopsriver 0023

3a. Country of import
South Africa

4. Exporter / Re-exporter (name,address and country)
P. Grunschloss
P. O. Box 11933
Windhoek

Signature of the applicant

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.

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.
[illegible]533

	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. tail	10. II W	11. 1 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.	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

REPUBLIC OF NAMIBIA

13. THIS PERMIT IS ISSUED BY:
J. Shapi

13 APR 2017

Windhoek
Place

13/04/2017
Date

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	1
B	
C	
D	

15. Bill of Landing / Air Waybill Number
083 – 3614 8781.

Hai
Port of Export / Re-export

12/10/17
Date

12 OCT 2017

Signature

Official stamp and title

Original

Nampist: 2308

PERMIT / CERTIFICATE 166149

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

☐ EXPORT
☐ RE-EXPORT
☒ IMPORT
☐ OTHER

ORIGINAL

2. Valid until 19/04/2017

3. Importer (name and address) Timothy Richard Decker
C/O Highveld Taxidermists
354 Vlakplaats. Hennopsriver
0023 Erasmia Pretoria

4. Exporter / Re-exporter (name, address and country)
K. Grunschloss
Windhoek
NAMIBIA

3a. Country of import RSA

5. Special conditions Valid without attached permit conditions (page 2 of 2) NA 0050579 dd 16/09/2016

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) H

5b. Security stamp No. 1357070

	7.a SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	8. Description of specimens, including identifying marks or numbers (age/sex) if live	9. Appendix No. and source (see reverse)	10. Quantity (including unit)	11a. Total exported / quota
A	Loxodonta africana African elephant NA 15 0081 24.20 NA 15 0082 22.85	Tusks	II W	2 (Two)	
	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	Loxodonta africana African elephant	Ears	II W	2 (Two)	
	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	Loxodonta africana African elephant	Feet	II W	4 (Four)	
	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	Loxodonta africana African elephant	Trunk	II W	1 (One)	
	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 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

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
20 OCT 2016
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG, 2000

1357070

Pretoria
Place

20/10/2016
Date

14. EXPORT ENDORSEMENT

Block	Quantity
A	02 (Two)
B	02 (Two)
C	04 (Four)
D	01 (One)

15. Bill of Lading/Air Waybill Number: 83 3408 1541

Port of Export

13/03/2017
28/2/17
Date

Cancelled by an Environmental Management Inspector
S Madali
Name in Print
13/03/2017
Date
Signature
Signature, official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621)

PERMIT / CERTIFICATE 166149

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 Richard Decker
c/o Highveld Taxidermists
354 Vlakplaats · Hennopsrivier
Erasmia 0023 Pretoria

3a Country of import RSA

4. Exporter / Re-exporter (name, address and country)
K. Grunschloss
Windhoek
NAMIBIA

5. Special conditions NA000579 dd 16/09/16
Invalid without attached permit
Conditions (page 2 pt 2) Integrated permit dot attached

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) H

5b. Security stamp No. 1357069

	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	(Loxodonta africana) African elephant	Skin panels	10. II W	11. 13 (Thirteen)	11a.
B					
C					
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 ***
A							
B							
C							
D							

* 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

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
19 OCT 2016
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 6769, JOHANNESBURG

Pretoria — Place
19/10/2016 — Date

14. EXPORT ENDORSEMENT:

Block	Quantity
A	13 (Thirteen)
B	
C	
D	

15. Bill of Lading/Air Waybill Number: 83 3408 1541

TNB HALL — Port of Export
13/03/2017 — Date

Checked by an Environmental Management Inspector
16/03/2017
Name in print
Signature
Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621)

PERMIT / CERTIFICATE 166148

PERMIT / CERTIFICATE No. 197031

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

☐ EXPORT
☐ RE-EXPORT
☒ IMPORT
☐ OTHER

ORIGINAL

2. Valid until 12/12/2017

3. Importer (name and full address)
Mr Timothy Richard Deiker
C/o Highveld Taxidermists
35 Le Vallplaats Annaspark Val
Erasmia 0023 PRETORIA RSA

3a. Country of import RSA

4. Exporter / Re-exporter (name, address and country)
K Gunschloss
Windhoek
NAMIBIA

5. Special conditions NA 0052553 dd 13/04/2017
Invalid without attached permit conditions (page 2 of 2) Integrated permit dd attached

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) H

5b. Security stamp No. 136 4317

	7.a 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. Tail	10. I W	11. 1 (one)	11a.
B	7.a	9.	10.	11.	11a.
C	7.a	9.	10.	11.	11a.
D	7.a	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 ***
A							
B							
C							
D							

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only for re-export of live specimens)
** Only for specimens of Appendix I species bred in captivity or artificially propagated for commercial purposes
*** For Pre-Convention specimens

GAUTENG PROVINCE
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
1364317

13. THIS PERMIT / CERTIFICATE IS ISSUED BY: P. Mthembu

19 JUN 2017

DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

Pretoria — Place
13/06/2017 — Date

Department of Environmental Affairs — Official seal
Cancelled by an Environmental Management Inspector
31/10/2017 — Date
Signature — Office stamp and title

14. EXPORT ENDORSEMENT:

Block	Quantity
A	1 (one)
B	
C	
D	

15. Bill of Lading/Air Waybill Number: 083 - 3614 8781

JNB — Port of Export
12/10/17 — Date

V & R Printing Works (Pty) Ltd (012) 333 2462 (5258)

PERMIT / CERTIFICATE No. 197031

Contact Name
Timothy Decker

Highveld Taxidermists,
Farm 354, Vlakplaats, Hennopsriver,
Centurion,
Gauteng,
South Africa -0023

Sales Order: 31453

Phone +27 12 650-0400
Fax +1 512-309-5373
Email 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 ane 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()%	
	Payments Received	-2,500
	GRAND TOTAL($)	**14,422.7**

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

Barry, Anna <anna_barry@fws.gov>

Status of Permit Number MA89901C-0, received 5/8/18

1 message

Management Authority, FWHQ <managementauthority@fws.gov> Tue, Jul 31, 2018 at 12:37 PM
To: Tim Decker (b) (6)
Bcc: anna_barry@fws.gov

Your application is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

Thank you,
U.S. Management Authority, Branch of Permits.

On Mon, Jul 30, 2018 at 3:57 PM, Tim Decker (b) (6) wrote:

> Dear Sir or Madam,
>
> I submitted an application to import an African elephant, and received acknowledgement of the application. I have been assigned PRT number MA89901C-0, and I am writing to find out what the status of my application is.
>
> Thank you very much,
>
> Timothy R. Decker

Barry, Anna <anna_barry@fws.gov>

Timothy Decker PRT #89901C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Oct 9, 2018 at 12:33 PM
To: (b) (6)

Dear Mr. Timothy Decker,

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by-application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African elephant and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT *You may have noticed that our* ***application forms expired 5/31/2017****. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Form 3-200-20

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

RCVD MAY 11 2018 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
McGinnis	Michael	J	JR
2. Date of Birth (for individuals)	3. Telephone Number		
(b) (6) [redacted]			

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Lyndhurst	VA	22952	Augusta	USA
2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

* 1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted] 4/30/2018

Signature of applicant/Principal officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

Same as page 1

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

Michael McGinnis (b) (6) [redacted]

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   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 Wuparo Conservancy in Zambezi Region of Namibia, Katima Mulilo - nearest City

   b. Date wildlife was hunted:

   Daggaboy Safaris, David Muller on september 5, 2017

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

Daggaboy Safaris, Dawid Muller

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
Okavi, 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: Dawid Muller
Business Name: Daggaboy 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 gil plainsgame 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 (b) (6) _____ 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).

RCVD MAY 15 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Lipworth	Alexander	J	
(b) (6) [redacted]	3.a. Alternate Telephone Number	4. E-mail address (b) (6) [redacted]	

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Opa locka	FL	33054	Miami-Dade	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) (b) (6) [redacted] 05/07/2018

Please continue to next pa

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 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 Ravinet (b) (6)
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. 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). NA

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
   SMJ Safaris
   Farm Annaster #915 PO Box 1601
   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:

N/A

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

N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

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: SMJ 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?

N/A

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

NA

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

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 [redacted] year.

    Applicant's signature: (b) (6) 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.:		21691927

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.J. Hipworth

Residential Address:

Country: U.S.A

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

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
I	Crocodile	
	Dik-dik	
	Eland	2x
II	Elephant	1x
	Giraffe	
	Grey Duiker	2x
II	Hippopotamus	
	Impala. Black-faced	
	Impala. common	
	Klipspringer	
	Kudu	2x
II	Lechwe	
	Oryx (Gemsbok)	2x
	Ostrich	2x
	Red hartebeest	1x
	Reedbuck	
I	Rhinoceros, black	
I	Rhinoceros, white	
	Roan	1x
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	1x
	Warthog	1x
	Waterbuck	
	Wildebeest, blue	2x
	Zebra, Burchell's	
II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
I	Cheetah	
I	Leopard	
II	Lion	
	Other	
	*Report back within 48hrs after hunt	

on the following farms / hunting concessions: Nyae - Nyae Conservancy

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

MINISTRY OF ENVIRONMENT & TOURISM
Rebecca R. Hafeni
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.

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) 175 477

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
23/10/17	Elephant		30,4kg		26,8kg			45	M.	Nyaw Nyaw Cons.			(9) (a) [redacted]	

Reported R. Swansen. 24/10/2017.

*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 hunding 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.

RCVD MAY 15 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b First Name	1.c. Middle Name/Initial	1.d Suffix
HOGAN	KEVIN	P.	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
TAYLOR RIDGE	ILLINOIS	61284	ROCK ISLAND	UNITED STATES

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f Country

Section D: All applicants MUST complete

1. Attach 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 ***...apter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and ...dge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

05/08/2018

Signature ... for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

   Same as Page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
   (b) (6) [redacted]

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

[No] Yes

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name. 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: _____ (b) (6) _____ 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).

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt: Commenced 02 / 07 / 2017 Terminated 08 / 07 / 2017

A. LP № 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) X	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 E Small

Business Address P.O Box 123

Alldays

0909

ID No 6309105066087

PH Permit No ZA/HP/170/6754

Date 8/7/2017 Signature

CLI

Name Kevin [redacted] Hogan

Permanent Postal Address [redacted]

Mt. Taylor Ridge Illinois

Code [redacted] U.S.A.

Passp [redacted]

Tel/Fax

Date 8/7/2017 Signa [redacted]

HUNTING OUTFITTER

Name E. Small

Business Address P.O Box 123

Alldays Code 0909

ID No 6309105066087

Tel No: 0795241635 Fax No:

HO Permit No ZA/HP/170/1927

Date 8/7/2017 Signature

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date of Hunt From	Date of Hunt To	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
Mapungubwe Game Reserve	Musina	L. Rahlagusi	12038	8/7	8/7	Elephant	ONE		X	Tusks, Skin, ears, skull, feet, Trunk etc.

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 Taxidermy

Code

Country: U.S.A. Trophy Export Date (Estimate):

Question 7

Question 7

ORDINARY PERMIT

PERMIT NUMBER: O № 12038

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	CEDET.
ADDRESS	Attn: Monika Erasmus
	LOUISTRICHARDT
PROVINCE	LIMPOPO

DETAILS OF PERMIT HOLDER

NAME	KEVIN PATRICK	ID NO.	
SURNAME	HOGAN	PASSPORT NO.	(b) (6)
	POSTAL ADDRESS	RESIDENTIAL ADDRESS	
ADDRESS		(b) (6)	
ADDRESS			
ADDRESS		TAYLOR RIDGE	
TOWN		ILLINOIS	
POSTAL CODE		61284	
PROVINCE		USA	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	Mr. K.P. HOGAN
NAME AND SURNAME: RESPONSIBLE PERSON	Mr. E. SMALL
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	MAPUNGUBWE GAME RESERVE
PHYSICAL ADDRESS OF FACILITY	ALLDAYS
DISTRICT	NTHEMBE
PROVINCE	LIMPOPO
REGISTERED NAME AND NUMBER (in the case of game farm)	MAPUNGUBWE GAME RESERVE

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
ELEPHANT	LOXODONTA	MALE	001 (ONE)	
	AFRICANA			

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

TO HUNT ONE CITES MALE ELEPHANT ON THE PROPERTY- MAPUNGUBWE GAME RESERVE - ALLDAYS - NTHEMBE - 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.P. HOGAN
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	Mr. E. 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: 03/07/2017 TO: 03/08/2017

RECEIPT NUMBER 1095365 - AMOUNT = R 5400-00

MALEKA S.T. (b) (6)

SIGNATURE OF ISSUING OFFICER: MIT HOLDER:

DATE STAMP:

WILDLIFE TRADE REGULATION
LOUIS TRICHARDT CENTRE
2017 -07- 03
P.O. BOX 2665 LOUIS TRICHARDT, 0920

Question 9

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 7th February till 9th 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 access 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.

Question c

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

Question c

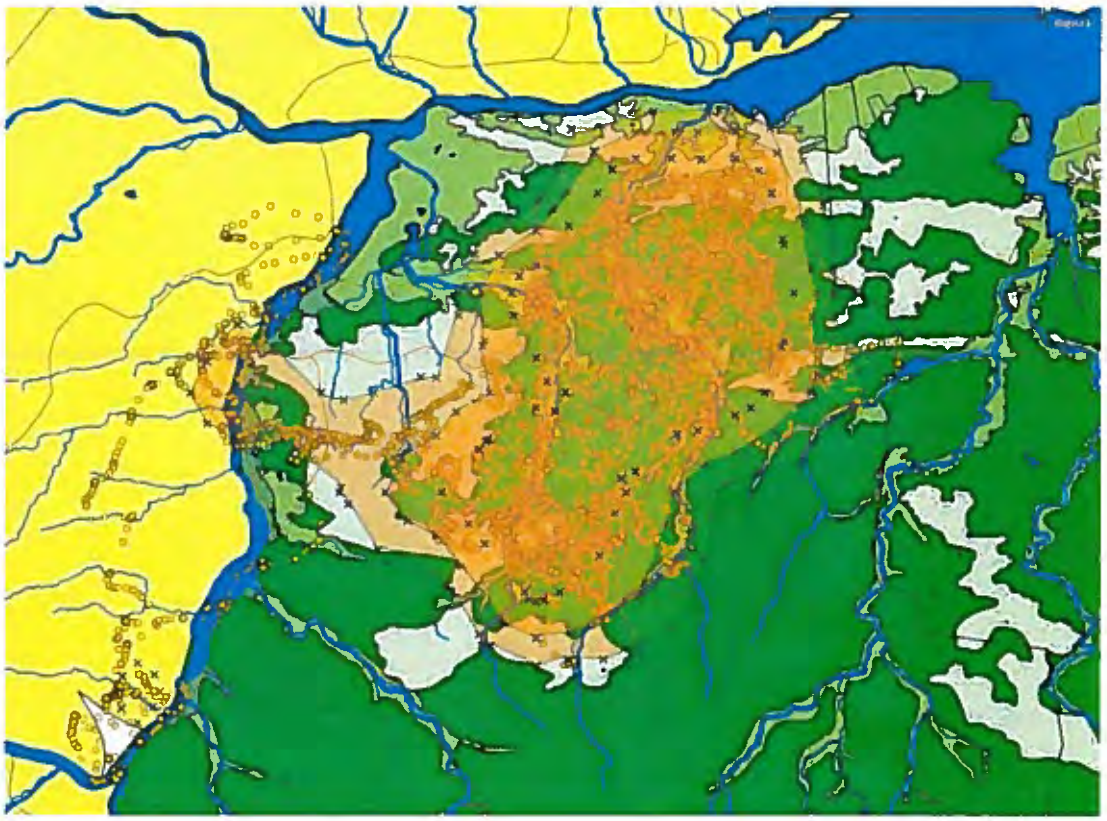
Elephant collared

One adult elephant cow, was darted and a collar fitted on 13 March 2015.

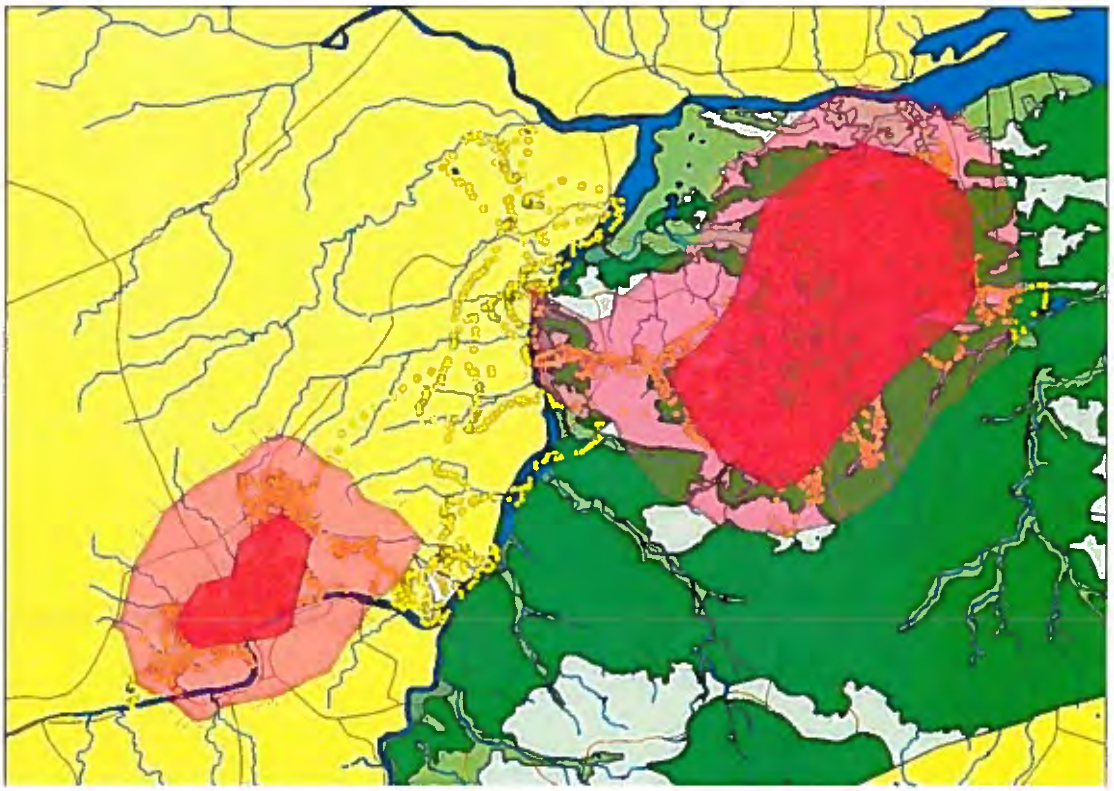
She was named Leila and is still part of one herd which consists of 89 animals.

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



Question 9

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.

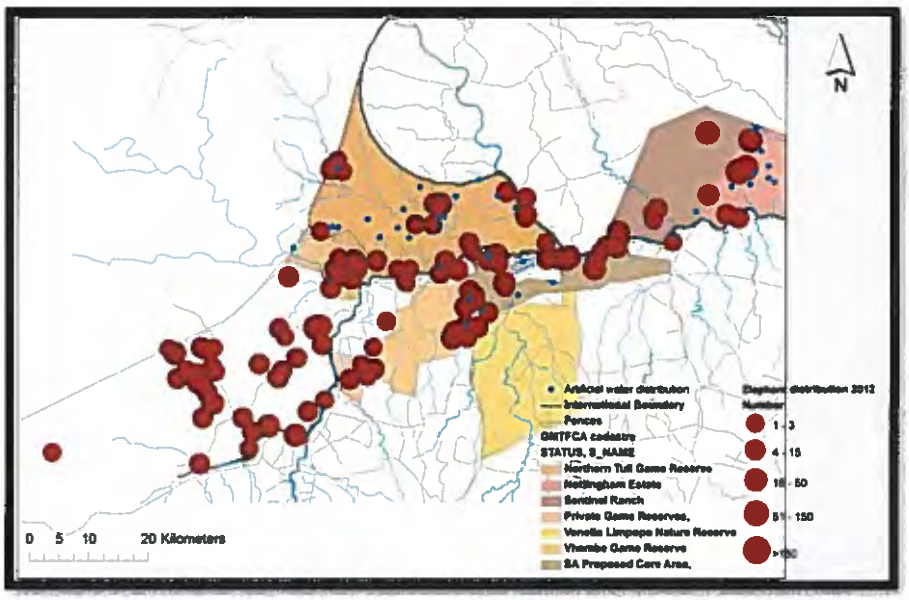


Figure 1: Elephant distribution and group sizes during the September 2012 total aerial count conducted in the Central Limpopo River Valley

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
Sub total	**574**	**892**	**298**	**721**	**562**	**743**	**570**
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
Sub total	**170**	**104**	**270**	**115**	**31**	**304**	**353**
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
Sub total	**145**	**10**	**150**	**0**	**0**	**0**	**0**
TOTAL	**1262**	**1294**	**1240**	**1080**	**1229**	**1237**	**1291**

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

The overall elephant distribution remained very similar between counts. Numbers of elephant south of the Limpopo River have increased steadily since 2007, while numbers within the Tuli Block west of the Motloutse River and the Northern Tuli Game Reserve fluctuate between years. The total number of elephants counted within the study area further remains 1200 – 1300, indicating that at least for the dry season this population remains stable. Group sizes are strongly correlated to rainfall with a higher number of small groups within years with low rainfall and fewer but larger groups in years with high rainfall.

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

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

Signe (b) (6) [redacted]

Name: DENNIS C HIRSCHFELD

Date: 4-12-2018

Form 3-200-20

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

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

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Hirschfeld	Dennis	C	

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

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
San Angelo	Texas	76904	Tom Green	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***ap*** [redacted] t the information submitted in this application for a permit is complete and ac [redacted] e statement herein may subject me to the criminal penalties of 18 U.S.C. 100

(b) (6) [redacted]

04/25/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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

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

---

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

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

   Conservation Force , 504-837-1233 , cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No ✓ Yes ____

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   ELEPHANT LOXODONTA AFRICANA

   b. Sex (if known). MALE

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

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

   Country -- Namibia , Region -- Zambezi East , Area -- Salambala (conservancy)

   b. Date wildlife is to be hunted: September17-Oct 2 , 2018

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

   Madubula Safaris -- John Abraham

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

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

   b. Date wildlife was hunted:

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

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

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

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

Name:	JOHN ABRAHAM
Business Name:	REISER TAXIDERMY
Address:	BOX 11908 WINDHOEK, PLOT #43 BRAKWATER
City:	+264 61 264207
State/Province:	
Country, Postal Code:	REISER@IWAY.NA

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

   a. Do you have any information regarding the population status or trend data on the species hunted?

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

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

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

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

    Taxidermist/Broker's signature: _____ Date: _____

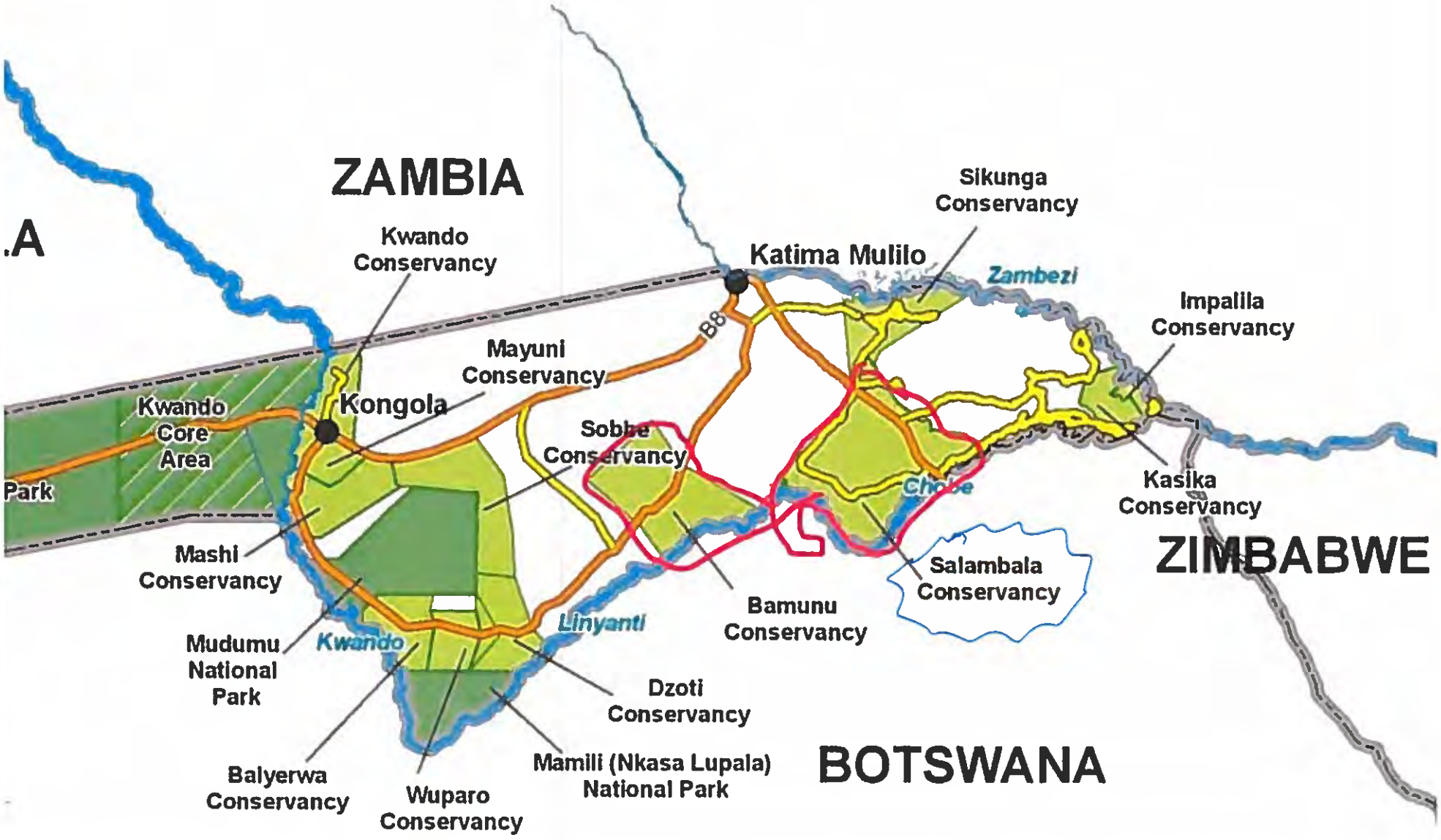
11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understa[redacted]tates, cannot be re-exported.

    Applicant's signatu[redacted] 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).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ZAMBIA
Kwando Conservancy
Katima Mulilo
Sikunga Conservancy
Zambezi
Impalila Conservancy
B8
Mayuni Conservancy
Kongola
Kwando Core Area
Park
Sobbe Conservancy
Chobe
Kasika Conservancy
ZIMBABWE
Mashi Conservancy
Salambala Conservancy
Bamunu Conservancy
Linyanti
Kwando
Mudumu National Park
Dzoti Conservancy
Balyerwa Conservancy
Wuparo Conservancy
Mamili (Nkasa Lupala) National Park
BOTSWANA

Conservation Biology

Contributed Paper

Complementary benefits of tourism and hunting to communal conservancies in Namibia

Robin Naidoo,* L. Chris Weaver,† Richard W. Diggle,† Greenwell Matongo,† Greg Stuart-Hill,† and Chris Thouless†‡

*WWF-US, 1250 24th Street NW, Washington, D.C. 20037, U.S.A., email robin.naidoo@wwfus.org
†WWF in Namibia, P.O. Box 9681, Windhoek, Namibia

Abstract: *Tourism and hunting both generate substantial revenues for communities and private operators in Africa, but few studies have quantitatively examined the trade-offs and synergies that may result from these two activities. We evaluated financial and in-kind benefit streams from tourism and hunting on 77 communal conservancies in Namibia from 1998 to 2013, where community-based wildlife conservation has been promoted as a land-use that complements traditional subsistence agriculture. We used data collected annually for all communal conservancies to characterize whether benefits were derived from hunting or tourism. We classified these benefits into 3 broad classes and examined how benefits flowed to stakeholders within communities under the status quo and under a simulated ban on hunting. Across all conservancies, total benefits from hunting and tourism increased at roughly the same rate, although conservancies typically started generating benefits from hunting within 3 years of formation as opposed to after 6 years for tourism. Disaggregation of data revealed that the main benefits from hunting were income for conservancy management and food in the form of meat for the community at large. The majority of tourism benefits were salaried jobs at lodges. A simulated ban on trophy hunting significantly reduced the number of conservancies that could cover their operating costs, whereas eliminating income from tourism did not have as severe an effect. Given that the benefits generated from hunting and tourism typically begin at different times in a conservancy's life-span (earlier vs. later, respectively) and flow to different segments of local communities, these 2 activities together may provide the greatest incentives for conservation on communal lands in Namibia. A singular focus on either hunting or tourism would reduce the value of wildlife as a competitive land-use option and have grave repercussions for the viability of community-based conservation efforts in Namibia, and possibly other parts of Africa.*

Keywords: communal lands, community-based conservation, financial benefits, hunting ban, in-kind benefits, stakeholders

Resumen: *El turismo y la caza generan ingresos públicos sustanciales para las comunidades y los operadores privados en África, pero pocos estudios han examinado cuantitativamente las compensaciones y las sinergias que pueden resultar de estas dos actividades. Evaluamos las oleadas de beneficios financieros y de pago en especie provenientes del turismo y la caza en 77 zonas de conservación comunal en Namibia desde 1998 a 2013, donde la conservación de vida silvestre basada en la comunidad ha sido promovida como un uso de suelo que complementa la agricultura tradicional de subsistencia. Usamos datos colectados anualmente de todas las zonas comunales para caracterizar si los beneficios se derivaron de la caza o el turismo. Clasificamos estos beneficios en tres categorías generales y examinamos cómo los beneficios fluyeron hacia los accionistas dentro de las comunidades bajo el status quo y bajo una prohibición simulada de la caza. En todas las zonas de conservación comunal, los beneficios totales de la caza y el turismo incrementaron aproximadamente a la misma tasa, aunque en estas zonas se comenzaron a generar beneficios de la caza normalmente dentro de los 3 años de formación, en contraste con del turismo que se generaron después de 6 años. La desagregación de los datos reveló que los principales beneficios de la caza fueron los ingresos para*

‡*Current address: Save the Elephants, Marula Manor, Marula Lane, Karen, P.O. Box 54667, Nairobi 00200, Kenya*
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el manejo de la conservación y la comida en forma de carne para la mayoría de la comunidad. La mayoría de los beneficios del turismo fueron trabajos a sueldo en hospedajes. Una prohibición simulada sobre la caza de trofeos redujo significativamente el número de zonas de conservación que podrían cubrir sus gastos de operación, mientras que la eliminación del ingreso por el turismo no tuvo un efecto severo. Dado que los beneficios generados por la caza y el turismo comienzan comúnmente a tiempos distintos en la duración total de la conservación (más temprano que más tarde, respectivamente) y fluyen a segmentos diferentes de las comunidades locales, estas dos actividades juntas pueden proporcionar incentivos más grandes para la conservación en las tierras comunales de Namibia. Un foco único sobre la caza o el turismo puede reducir el valor de la vida silvestre como opción de uso de suelo competitivo y tener repercusiones graves sobre la viabilidad de los esfuerzos de conservación basada en comunidades de Namibia, y posiblemente de otras partes de África.

Palabras Clave: accionistas, beneficios financieros, beneficios de pago en especie, conservación basada en la comunidad, prohibición de la caza, tierras comunales

Introduction

Current paradigms in conservation increasingly emphasize the utilitarian aspect of safeguarding biodiversity (Daily et al. 2009; Redford & Adams 2009; Guerry et al. 2015), as opposed to more traditional strategies such as protected areas and strict land-use zoning. Ecosystem service approaches and payments for environmental services (PES) schemes are based on the assumption that ensuring a supply of environmental benefits to people will result in the conservation of biodiversity and of natural areas (Tallis et al. 2009; Tallis & Polasky 2009). However, this increasing emphasis on a utilitarian approach to conservation has spawned much debate and criticism. Some contend this new conservation diverts efforts away from ensuring the persistence of biodiversity and puts too much focus on human needs and well-being (Soule 2013; Doak et al. 2014). Others argue that PES programs and partnerships with corporations are resulting in the commodification of nature and that market-based approaches are likely to favor the rich, powerful, and foreign at the expense of local communities and the poor (Sullivan 2006; Igoe et al. 2010).

Although approaches to natural resource management and biodiversity conservation in southern Africa have long been grounded in similar utilitarian perspectives (Child 2004; Carruthers 2008), few approaches to conservation are currently as controversial as the hunting of large and charismatic species as a means of generating benefits and incentives for conservation in this part of the world (Lindsey et al. 2006; Lindsey et al. 2007). Heightened concerns surrounding animal rights and the ethics of hunting, often inflamed by images on social media of trophy hunters posing with dead animals, have led to an increasingly vocal Western opposition to trophy hunting in Africa. This opposition is contributing to tangible policy changes, including the banning of trophy hunting in Botswana (Pabst 2013), restrictions on imports of trophies of certain species to countries such as the United States and Australia (Milman 2015), and the barring of trophies from being transported on some major commercial airlines (Wieczner 2015). Ironically, this Western opposition to trophy hunting comes despite the fact that hunting benefits were one of the early motivations for conservation in North America (Geist et al. 2001), and even today proceeds from hunting licenses in the United States (via the Pittman-Robertson Act) and Canada continue to generate hundreds of millions of dollars every year for wildlife management and habitat protection (Arnett & Southwick 2015).

The impact that changes in hunting policies may have on the conservation of wildlife and on the incentives for African people to coexist with wildlife is not well understood (Buckley & Mossaz 2015). There has been little examination of how benefits from hunting compare with benefits from nonconsumptive nature-based tourism in terms of incentives for local people to conserve species and wildlife habitat, although others have suggested the two may be complementary, rather than substitutive, activities (Leader-Williams et al. 2001; Lindsey et al. 2006). A major limitation is that data on the variety of financial benefits that wildlife generate are typically not systematically collected, especially across different temporal and spatial scales. Yet understanding who benefits, and how, from wildlife as a land use is a critical prerequisite to designing effective policies and programs that support conservation as a sustainable alternative to other, less biodiversity friendly, land uses.

Despite the above knowledge gaps, it is clear that for wildlife to survive outside (and perhaps even inside) protected areas in Africa, people must have strong incentives to tolerate, or ideally embrace, wildlife as a land use (Roe et al. 2009; Dickman et al. 2011; Child et al. 2012). Given that strict protected areas comprise a small and unrepresentative fraction of the African continent, and that even within protected areas wildlife is declining (Western et al. 2009; Craigie et al. 2010), approaches that seek to capture multiple benefits from wildlife conservation on state, private, and communal lands in Africa are indispensable. This principle is especially important when considering the diverse relationships between local communities and wildlife. Communities living with wildlife

are not monolithic entities; rather, they are composed of different groups of people who will experience different costs and benefits from wildlife conservation (Agrawal & Gibson 1999; Roe et al. 2009). For example, wealthy cattle owners and poor subsistence farmers will have different perceptions of wildlife conservation given the particular costs and benefits they are likely to experience. Diversifying benefit streams from wildlife conservation so that the variety of stakeholders within local communities are incentivized to promote or at minimum tolerate living with wildlife will provide the greatest likelihood that conservation as a land use will ultimately prove more attractive than wildlife-unfriendly alternatives. Because communal lands comprise a large fraction of rural Africa (up to 500% more than state-managed forest reserves and national parks [Alden Wily 2011]), management of these lands will play a huge role in determining the success or failure of biodiversity conservation efforts across the continent.

We focused on how different types of benefits provided by wildlife vary over time, space, and community stakeholder groups in communal conservancies in Namibia. Namibia's Community-Based Natural Resource Management (CBNRM) program began in the mid-1990s, when progressive legislation for the devolution of conditional rights to natural resources allowed communities to register areas of customary landholding as "communal conservancies." Registering these conservancies (involving developing zoning and sustainable resource management plans and a constitution) allows local communities to manage and benefit from wildlife and other natural resources on their traditional lands. Prior to the legislation, natural resources were the sole property of the state. Although wildlife has been used by people for millennia in the region that is now Namibia, the last century was characterized by declines in various species, starting with the rinderpest outbreak at the end of the 19th century, followed by overhunting of big game species by colonial hunters, and more recently by a major drought combined with a poaching increase in the 1980s (Owen-Smith 2010). Namibia's CBNRM program is widely recognized as having contributed to a strong recovery of wildlife in large parts of the country, through the creation of social and economic incentives for the sustainable coexistence of wildlife and people on communal lands (Owen-Smith 2010; Naidoo et al. 2011*b*; NACSO 2013). Additionally, the principles used to incentivize communities to steward wildlife across very large spatial scales are already being adopted by numerous other countries in Africa and beyond (NACSO 2013). We examined how changes in benefits over time generated on communal conservancies in Namibia vary according to whether they were derived from tourism or hunting (the 2 most significant benefits derived from wildlife). We also assessed how these benefits flow to different stakeholders within local communities and how factors such as time of establishment and changes in resource management policies affect such benefit flows on communal lands.

Methods

We used data from 77 communal conservancies registered by 2012 in Namibia to examine benefit flows associated with hunting and photographic tourism. The first four of these conservancies were established in 1998, and we used data through the 2013 calendar year for all of them. For both hunting and tourism, conservancies negotiate agreements with private operators. The agreements between conservancies and operators specify the portion of income the conservancy receives (typically 8–12% of total lodge revenue and from 30–75% of trophy price, depending on the species) and jobs to be offered to community members with the operation (from 20–50 for tourism lodges, depending on factors such as size and location, and 8–10 for hunting camps). In addition, community members hunt for subsistence and allow local sales of meat from wildlife through game cropping. Information on fees paid to conservancy management committees; salaries of community members employed in the tourism or hunting industry; and nonfinancial benefits (primarily meat from hunting, but also meals, training, human-wildlife conflict compensation, and other donations to the community at large) is compiled annually by every conservancy. Financial reporting of conservancies is supported by various nongovernmental organizations, is ground-truthed, and is double-checked against analogous reports from tourism and hunting operators.

We used these data and categorized each source of benefit as to whether it was derived from tourism or from hunting. The CBNRM program uses the price of buying alternative meat as the value of wild meat distributed from animals that were hunted (replacement-cost shadow price approach). In 2013, it was 18 Namibian dollars/kg of meat (NACSO 2013). This shadow price can vary and is adjusted from year to year to reflect supply and demand, but the same rate is applied across the country in order to maintain comparability of meat benefits generated in different regions. We used a consumer price index produced by the Bank of Namibia to standardize benefit figures from all years into constant 2013 Namibian dollars. We subsequently expressed all figures in 2013 U.S. dollars (U.S.$) based on the average monthly exchange rate in 2013 of U.S.$1 = N$9.64.

We divided benefits into the 3 classes (described above) because each represented a different type of gain that is channeled to different parts of a conservancy and has different implications for the sustainability of the conservancy and for its livelihood value to members. Income (i.e., fees from lodge and hunting concessions) to management committees is used by conservancies to cover operational and management costs

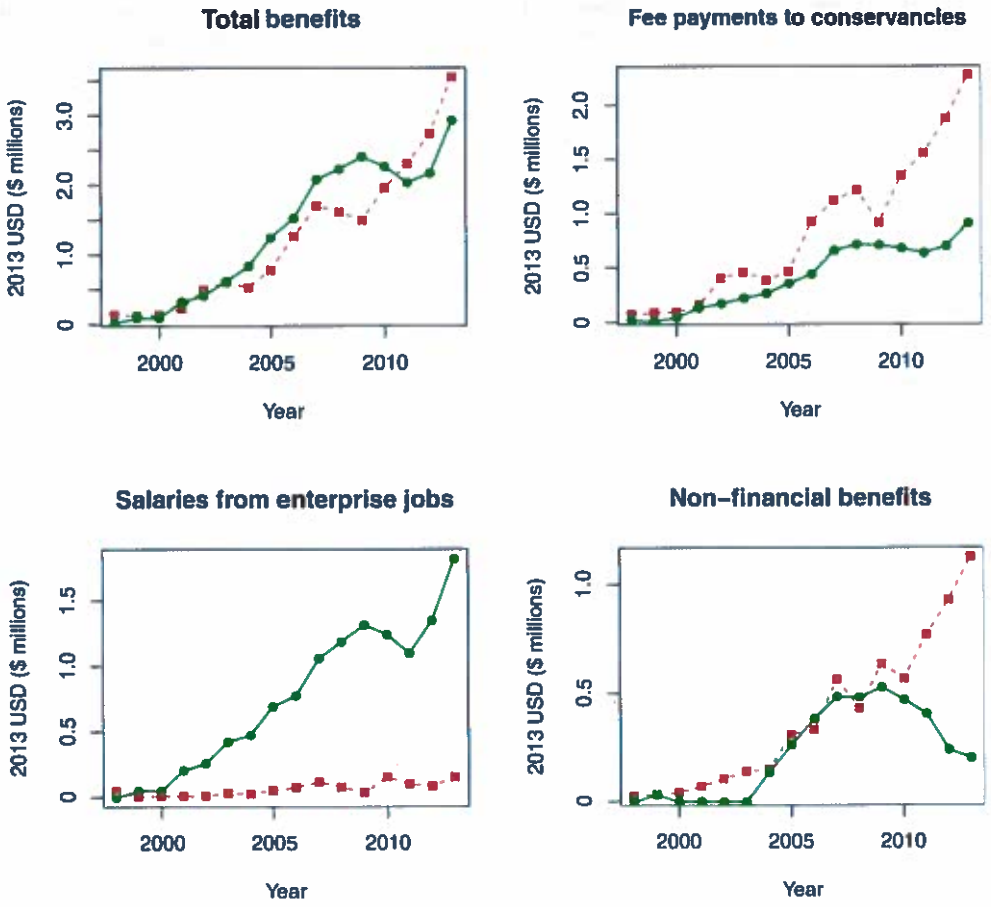

Figure 1. Benefits generated across all conservancies in Namibia's Community-Based Natural Resource Management program, 1998–2013, from hunting (squares) and tourism (circles): (a) total benefits, (b) fee payments to conservancies, (c) salaries from enterprise jobs, and (d) nonfinancial benefits.

(including paying the salaries of community game guards and other conservancy staff members, vehicle fuel costs and maintenance, and office upkeep expenses) and is also distributed as cash and funds for development projects within the community. Individual conservancy members who are salaried employees at tourism lodges or hunting camps clearly benefit financially from conservation, and this linkage should result in strong incentives for promoting wildlife as a land use in their households and among their families and social networks within the community. Conservancy members also benefit individually from the consumption of wild meat that is distributed throughout the community from hunted animals. This benefit, although nonfinancial, is typically viewed as a strong and very direct link between the value of having wildlife on communal lands and the members' livelihoods and well-being (NACSO 2013). To quantify the magnitude of these financial flows from hunting and tourism to stakeholders within communities, we used a subset of conservancy data from 2011 to 2013, during which time detailed financial accounting statements were used to track incoming conservancy revenue.

To simulate how a trophy hunting ban would affect the viability of communal conservancies in Namibia, we used detailed financial statements that were available for a subset of 50 conservancies in 2013 (all but two of the 52 conservancies that generated some level of benefits in 2013) and tabulated the operating costs each conservancy accrued. We then simulated the effects of a ban by removing all cash income that conservancies earned from trophy hunting in 2013 (assuming this cash income could not be substituted by increases in tourism) and calculated the difference in the proportion of conservancies that were able to cover their operating costs based on conservancy income under the status quo versus under a trophy-hunting ban. For comparison's sake, we removed all conservancy income from tourism and assessed how this changed financial viability of conservancies. We also used data on harvested animals and nationally averaged trophy prices to estimate the contribution of individual wildlife species to trophy hunting income.

Finally, for each conservancy we split total benefits over time into 2 series, one for hunting and one for tourism (Supporting Information). We characterized

these financial time series by calculating 4 metrics per conservancy: temporal trend (slope from a linear regression of benefits on year); volatility (root mean square error from the linear regression); end point (magnitude of benefits in 2013); and lag time between year conservancy registered and year the first benefits were generated.

We used *t* tests on these metrics to assess whether temporal flows of benefits to conservancies were significantly different between hunting and tourism.

Results

Of the 77 conservancies established by 2012, 25 reported not generating any benefits from either hunting or tourism. Considering all conservancies in Namibia's CBNRM program, aggregate benefits increased over time (Fig. 1). Total benefits from tourism and hunting were similar in the early years of the program, but tourism benefits exceeded those from hunting from 2003 to 2010, whereas from 2011 to 2013 the benefits from hunting were greater than tourism benefits (Fig. 1a). Although fee payments to conservancies and nonfinancial benefits (primarily meat) from hunting accumulated at higher levels than those from tourism (Figs. 1b and d), total salaries from tourism enterprise jobs increased 10 times faster than salaries from hunting jobs (Fig. 1c). Nonfinancial benefits from tourism dropped sharply from 2011–2013 relative to continued increasing nonfinancial benefits from hunting (Fig. 1d), a result that may have coincided with the worldwide economic downturn in 2008 and fewer available resources for tourism companies to make additional contributions to conservancies.

Conservancies were formed in roughly 4 cohorts that coincided with (1) initial heavy donor investment (1998–2001, 15 conservancies), (2) a period of declining donor investment (2003–2005, 29 conservancies), (3) an upturn in investment peaking in 2009 (2006–2009, 15 conservancies), and (4) a further increased-investment phase (2011–2013, including 18 conservancies registered by the end of 2012). The earliest conservancies, in cohort 1, had similar levels of total benefits for the first 6 years after registration, after which benefits from both hunting and tourism continued to increase but at a faster rate for tourism (Fig. 2a). Conservancies in cohort 2 (Fig. 2b) had roughly similar rates of growth in total benefits from tourism and hunting, whereas cohorts 3 (Fig. 2c) and 4 (Fig. 2d) earned virtually no benefits from tourism and had either moderate (cohort 3) or low (cohort 4) benefits from hunting.

Disaggregating the national-level data revealed that pathways for generating benefits over time varied substantially among conservancies (Supporting Information). Of the 52 conservancies that derived some level of benefits from wildlife, 28 derived all or almost all of their total benefits from hunting, 6 derived all or almost all benefits from tourism, and 18 had substantial levels of benefits from both hunting and tourism.

Although there was a tendency for the total benefits from tourism to be higher than those from hunting, there were no significant differences for any of the conservancy time series metrics (Table 1). The only exception to this was the lag time between conservation formation and the beginning of benefits generation. After their formation, conservancies derived benefits from hunting approximately twice as quickly as they derived benefits from tourism (Table 1). On average, conservancies started generating benefits from hunting about 3 years after their formation, whereas it took 6 years, on average, after conservancy formation to start generating benefits from tourism.

In addition to temporal and spatial differentiation, there were differences in how benefits from tourism and trophy hunting flowed to the different constituencies contained within communal conservancies (Fig. 3). Based on detailed financial accounting data from 2011–2013, 58.3% of the financial benefits from tourism were in the form of jobs to conservancy members at joint-venture lodges, whereas 30.3% of the benefits were lodge contractual fees used for conservancy management and 11.5% were nonfinancial benefits to the community at large less.

In contrast, the majority (64.3%) of the benefits from hunting were in the form of cash for the operation of the conservancy, and a substantial fraction went to the community at large in the form of meat from hunted animals (32.0%, or approximately 1.4 million kg over the 3 years). Conservancies used income from trophy hunting and tourism in a variety of ways that benefited the entire community (Fig. 3), most importantly for the salaries of conservancy employees and for other conservancy operating costs, but also for compensation for wildlife conflict, payments to traditional authority structures, direct cash dividends, community-level projects, and infrastructure development. Our data suggest that operational costs, conservancy employee salaries, and the various benefits to the community at large were mostly derived from hunting because hunting operators paid fees from 2011–2013 of $5.41 million (72% of the total), whereas tourism operators paid $2.13 million (28%).

Currently, many conservancies cover their operating costs with income derived from trophy hunting and from tourism that is directed to conservancy management. Simulation of a trophy hunting ban showed a reduction in the number of conservancies with incomes greater than operating costs in 2013, from 74% (37 of 50) under the status quo to 16% (8 of 50) when conservancy income from hunting was eliminated. If this reduction were to occur throughout the country, it would cover nearly 50,000 km^2 (Fig. 4). When conservancy income from tourism was removed, the effect was again negative but

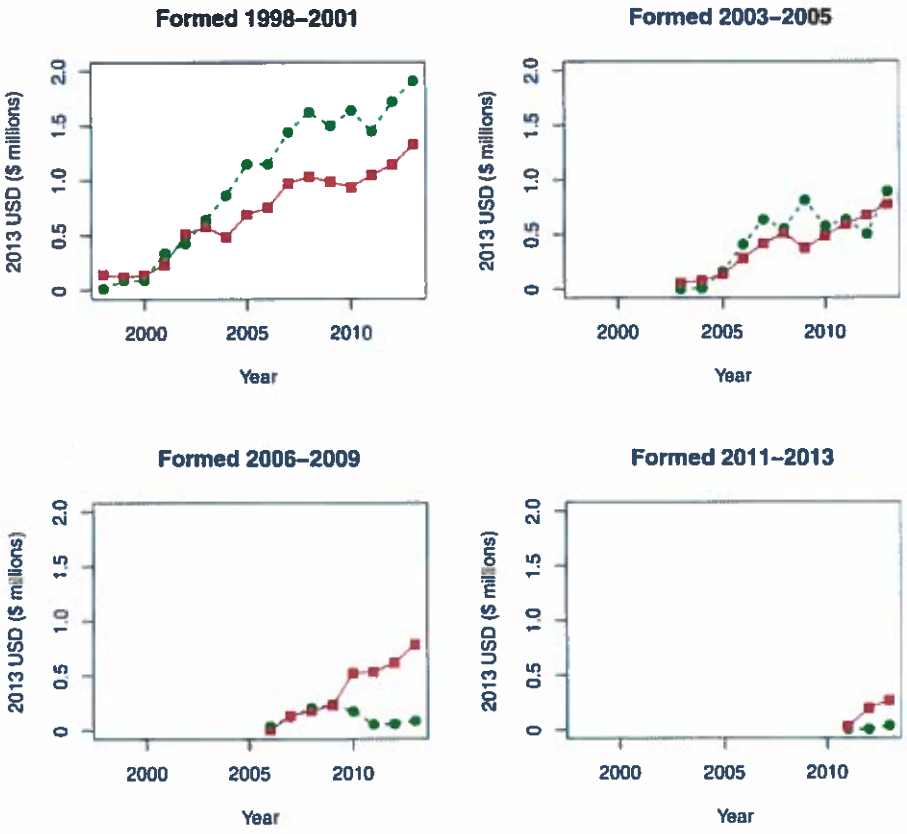

Figure 2. Total benefits from 1998–2013 for hunting (squares) and tourism (circles) across conservancies formed in 4 periods: (a) 1998–2001 (n = 15), (b) 2003–2005 (n = 29), (c) 2006–2009 (n = 15), and (d) 2011–2013 (n = 18).

Table 1. Statistical differences among time series of different metrics of total benefits (in U.S. 2013 dollars) generated from trophy hunting versus tourism on communal conservancies ($n = 52$) in Namibia.*

Variable	*Hunting*	*Tourism*	*t*	*P*
Benefits in 2013 (U.S.$ 2013)	41,453	56,255	−0.91	0.36
Trend (linear regression) of annual change (U.S.$ 2013)	2458	3954	−1.39	0.17
Volatility (root mean square error) of change over time (U.S.$ 2013)	79,192	82,501	−0.16	0.83
Average annual gain (U.S.$ 2013)	8723	11,175	−0.93	0.36
Maximum annual gain (U.S.$ 2013)	47,420	68,694	−1.19	0.23
Lag (years) between conservancy formation and first benefits	2.81	5.71	−3.29	0.001
Number of conservancies specializing in hunting or tourism	28	6	—	—

**Excluding conservancies that had not generated any benefits from either hunting or tourism.*

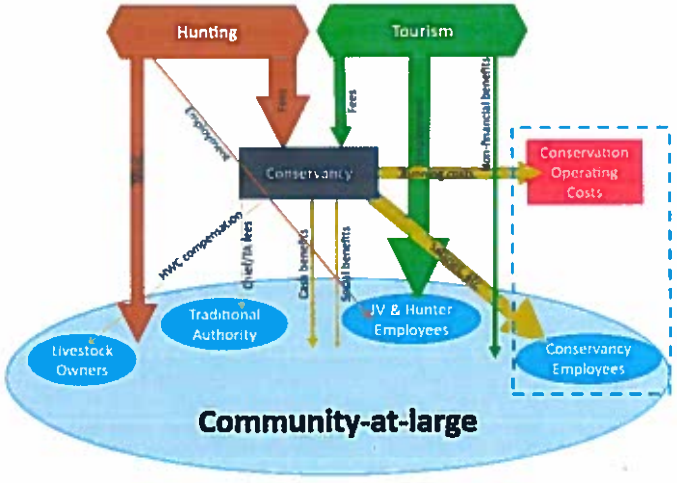

Figure 3. The flow of benefits to various sectors of a stylized local community in Namibia (widths of arrows proportional to dollar values of flows to conservancies from 2011 to 2013; brown, hunting benefit; green, tourism benefit; olive green, flows with a mix of hunting and tourism benefits; dashed rectangle, reinvestment of income into conservation activities; JV, joint venture tourism; HWC, human wildlife conflict; TA, traditional authority). Specific stakeholders (blue ovals) and the overall community at large receive the benefit flows indicated by the arrows ending in those ovals. Income to the conservancy committee (black rectangle) comes from both sectors and is redistributed as indicated, including to cover conservation operating costs (red square).

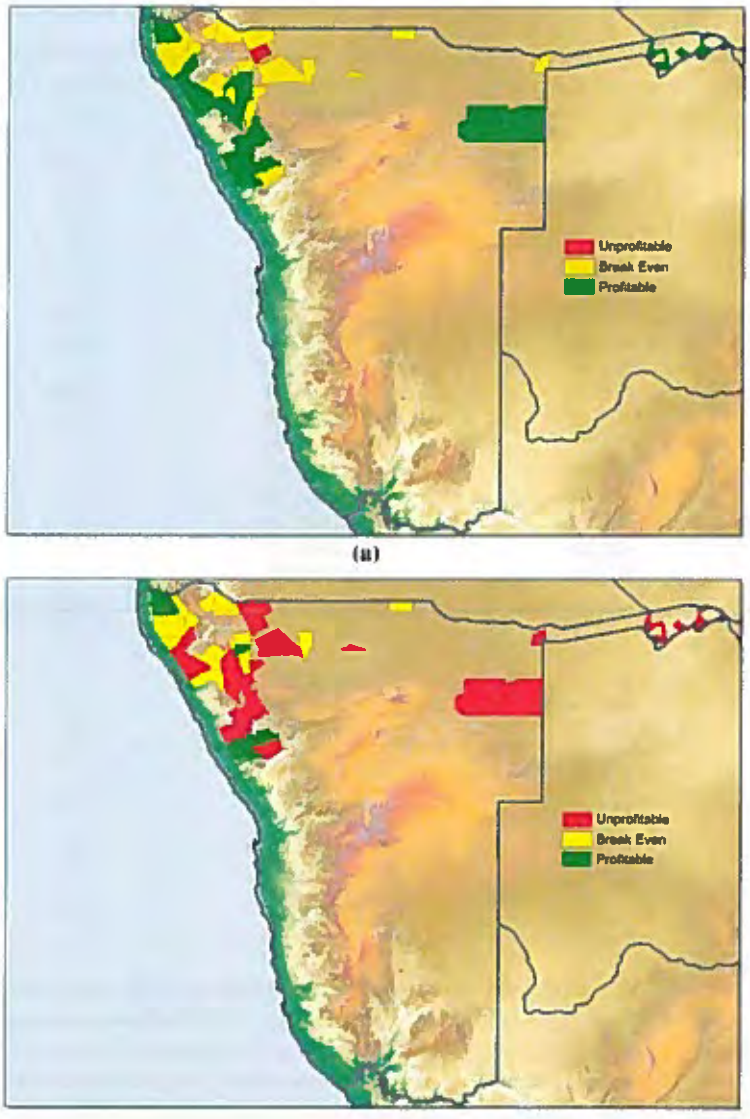

Figure 4. Revenues minus operating costs for 50 communal conservancies for which detailed management cost data were available in 2013 under (a) the status quo and (b) a simulated trophy hunting ban. Break-even conservancies indicate those for which revenues and operating costs are within $5000 of one another.

less marked; 59% of conservancies remained able to cover their operating costs.

Finally, of the 303 animals harvested by trophy hunters in 2013, individuals from 2 of the Big-5 (buffalo [*Syncerus caffer*], elephant [*Loxodonta africana*], lion [*Panthera leo*], leopard [*Panthera pardus*], rhinoceros [*Diceros bicornis* and *Ceratotherium simum*) species hunted in Africa, buffalo and elephant, accounted for 78.3% of hunting revenue; over 55% was attributable just to elephants (Table 2).

Discussion

Despite the importance of both tourism and hunting to conservation, and the debate surrounding their implementation, we are the first study to use detailed quantitative data across multiple jurisdictions and over a lengthy time span to directly compare the financial performance of these two activities. Our data from 77 Namibian conservancies from 1998 to 2013 showed that trophy hunting and tourism reached similar aggregate levels but began to generate benefits at different times (earlier vs. later in a conservancy's life-span) and flowed to different beneficiaries (community management committees and the community at large vs. individual employees). Previous work in Namibia has demonstrated that benefits from hunting and tourism are also spatially differentiated; conservancies are more likely to generate benefits from hunting in areas with diverse wildlife and Big-5 species, whereas the presence of black rhinoceros (*Diceros bicornis*) and broader environmental conditions (distance to tourist routes, topographical diversity, and rainfall) are correlated with higher benefits from tourism (Naidoo et al. 2011*b*). In addition, the first conservancies established were typically those with the highest potential to

Table 2. Number of animals killed by trophy hunters in 2013, by species; average payment made per animal; and the estimated overall contribution of each species to trophy hunting income on communal conservancies in Namibia.

Species	*Animals hunted*	*Payment per animal (2013 U.S.$)*	*Revenue (2013 U.S.$)*	*Percentage of total*
Baboon	17	25.62	435.58	0.03
Black-backed jackal	6	23.65	141.91	0.01
Black-faced impala	8	723.55	5788.38	0.3
Blue wildebeest	12	382.26	4587.14	0.3
Buffalo	71	5497.93	390,352.70	23.4
Burchell's zebra	22	388.69	8550.10	0.5
Bushbuck	1	746.89	746.89	0.04
Common impala	22	180.91	3980.08	0.2
Crocodile	22	1321.06	29,063.28	1.7
Common duiker	5	116.18	580.91	0.03
Elephant	69	13,296.47	917,458.09	54.9
Gemsbok	60	274.79	16,490.46	1
Giraffe	7	677.80	4744.50	0.3
Hartmann's mountain zebra	67	356.54	23,887.76	1.4
Hippopotamus	31	2068.26	64,117.43	3.8
Klipspringer	9	282.88	2546.27	0.2
Kudu	55	449.38	24,718.57	1.5
Red lechwe	13	1190.35	15,474.59	0.9
Leopard	11	2210.79	24,318.88	1.5
Lion	2	11,371.89	22,743.78	1.4
Ostrich	14	102.49	1435.17	0.1
Reedbuck	3	591.29	1773.86	0.1
Roan antelope	9	4385.68	39,470.95	2.4
Sable antelope	9	5290.46	47,614.11	2.8
Spotted hyena	5	297.30	1486.41	0.1
Springbok	89	154.56	13,756.85	0.8
Steenbok	10	89.73	897.61	0.1
Warthog	17	187.03	3179.46	0.2
Waterbuck	1	1037.34	1037.34	0.1
Totals	667	—	1,671,379.05	100

generate benefits from wildlife, and, as with our cohort results, older conservancies generate higher levels of aggregate benefits than younger ones (Naidoo et al. 2011*a*; Humavindu & Stage 2015).

We found that tourism and hunting both made substantial and separate contributions to the economic welfare of rural communal residents; the former was weighted toward employment and wages and the latter toward governance structures and management costs. A focus on either one or the other would lead to substantial reductions in overall benefit generation and incentives for wildlife conservation throughout Namibia. For much of Africa and other parts of the world, Westerners tend to view tourism as the dominant wildlife-based development paradigm for delivering a sustainable flow of benefits to local communities living with wildlife or near protected areas (Kiss 2004; Hawkins & Mann 2007). Similar to the results of studies of private landholders (Lindsey et al. 2013*b*) and national economies (Barnes et al. 2002; Lindsey et al. 2007), our results showed it is important to recognize that the direct benefits of hunting are roughly similar in magnitude to those of tourism for communal conservancies in Namibia.

Beyond this aggregate overall similarity between the benefits of hunting and tourism, there are important differences in scale and sequencing between the two activities. For the typical conservancy, benefits from hunting are generated quickly, within a few years of formation. In these early years of a conservancy, income from trophy hunting is critical for the management of the area, and the meat from hunted animals makes tangible the economic benefits that wildlife conservation can deliver to conservancy members. Benefits from tourism take twice as long to develop, due to the time needed for the recovery of wildlife populations, and the investments in both physical (i.e., lodges and other infrastructure) and human capital required to host high-end tourism in communal areas. Few conservancies (12%) specialized in tourism; most conservancies generating benefits from tourism also generated benefits from hunting. In contrast, over half (54%) of the conservancies generating benefits in Namibia did so from hunting alone, because hunting can be sustained in areas with relatively low densities or visibilities of wildlife, and in landscapes that are unappealing or inaccessible for photographic tourism (Lindsey et al. 2006). Because these conditions characterize much of the African protected-(in the widest sense) area estate, it follows that preventing or discouraging trophy hunting would remove possible incentives for conservation across a large swathe of the continent

where nature-based tourism is not viable (e.g., Blom 2004).

Benefits from trophy hunting and tourism also accrue to different stakeholders within communal conservancies. Benefits from tourism were mainly in the form of employment income to conservancy members who are hired to work at lodges built on conservancy land. Although these employees normally come from among a group of conservancy members nominated by the conservancy, ultimately staff are hired based on their knowledge, communication skills, and potential. Jobs of any kind are extremely rare in remote rural areas and thus highly sought after; therefore, tourism is viewed very favorably by local residents who are employed in the industry (Suich 2010; Silva & Motzer 2015). In contrast, agreements between communities and hunting operators provide significantly higher levels of income for conservancy management, as well as greater nonfinancial benefits (largely from meat) distributed directly to the community at large.

The income to management committees is essential; without it, most communal conservancies in Namibia would be unable to cover their operating costs (which three-quarters of the 50 conservancies we assessed were doing). Conservancies unable to cover their operating costs will likely cease to pursue conservation as a viable land use because without conservancy income, game guards cannot be paid, management and monitoring plans cannot be developed and instituted, the sense of local ownership over natural resources dissipates, and wildlife becomes much more vulnerable to declines from poaching and overharvest. This link between income from hunting and the conditions and incentives that permit wildlife to persist as an economically viable land use is critical but often unrecognized. Our data also show that almost 80% of hunting benefits are delivered by two species (elephant and buffalo); elephants alone generate over 50% of all hunting benefits from an increasing population base (7500 individuals in 1995 to over 20,000 in 2012 [Craig 1999; Ministry of Environment and Tourism 2012]). Therefore, even a targeted hunting ban on elephants or an import ban such as those that currently prevent the import of elephant trophies from Tanzania and Zimbabwe into the United States is likely to have a very negative impact on Namibia's CBNRM program by severely undermining conservancy governance structures and incentives for conservation. Anecdotal accounts of the impact of Botswana's 2014 hunting ban suggests that similar negative consequences (an increase in poaching for meat and trade and increased collaboration of local communities with international poaching gangs) may be occurring there (Somerville 2015).

Although we found there were impressive financial gains from trophy hunting, the sustainability (both ecological and economic) of these operations on communal lands in Namibia is rightly of major concern. As such, it is regulated via annual estimates of species' populations and harvest quotas derived in agreement with local communities and the Ministry of Environment and Tourism (NACSO 2013). Although data from the various conservancy landscapes within the country indicate populations in these areas have generally increased since the advent of Namibia's CBNRM program (Naidoo et al. 2011*b*), evidence on possible negative impacts of trophy hunting on wildlife populations in other parts of Africa (Packer et al. 2010; Lindsey et al. 2013*a*) means that trophy hunting must be carefully monitored in Namibia to ensure the same does not happen. There have been no assessments on how trophy size or quality in particular species may be changing over time, a concern that has been raised for trophy hunting in Africa (Crosmary et al. 2013) and that may result in undesirable genetic changes within hunted populations (Coltman et al. 2003). It is therefore critical that data on the size and quality of trophy exports be analyzed for Namibia's CBNRM program to inform monitoring, evaluation, and management of the trophy-hunting industry. High-profile, apparently illegal hunts such as of lions on the borders of national parks in Zimbabwe, and ethically dubious practices, such as canned hunting of captive animals, also illustrate that the industry itself must play a greater role in addressing issues that throw the sector into disrepute. Finally, growing human populations and a tremendous increase in elephant poaching for the international ivory market may eventually result in reduced quotas of elephants and therefore threaten the financial benefits communal conservancies have generated through trophy hunting.

The sustainability of photographic nature-based tourism in Africa and beyond has also come under scrutiny (Buckley 2004; Newsome et al. 2012). In Namibia relevant issues for ecological sustainability include impacts of intense wildlife viewing on animal behavior, localized environmental implications of the development of tourism infrastructure (lodges, campsites, roads, disposal facilities, etc.) in sensitive arid environments, and climate-change impacts from the carbon emissions of increasing numbers of international visitors. As with trophy hunting, there are few studies, particularly for the first two considerations, that have evaluated the sustainability of tourism initiatives on communal conservancies in Namibia. Furthermore, from a socioeconomic point of view nature-based tourism on communal lands in Namibia has been criticized as having power imbalances or elite capture issues that render communities unable to secure significant shares of the benefits (Hoole 2010; Lapeyre 2011), even though residents of conservancies with high benefit levels are themselves strongly supportive of tourism (Silva & Motzer 2015). Finally, to assess more fully the overall costs and benefits of wildlife conservation on communal lands in Namibia, there is a need for greater investigation of both human-wildlife conflict costs and who bears them, as well as the opportunity

costs of pursuing wildlife conservation as a land use versus alternative uses.

Despite these caveats, our results show that hunting and tourism generated similar aggregate levels of benefits for local communities in Namibia. Because these benefits occur at different times, in different places, and reach different sections of local communities, each are essential to the successful functioning of community-based natural resource management in Namibia. As with other contexts (Sandbrook & Adams 2012), recognizing that benefits from conservation to local communities take various pathways has important implications for conservation and the development of effective incentives. Further investigation is therefore desperately needed to examine the relative impacts of hunting and tourism in many others areas of conservation importance in sub-Saharan Africa.

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Supporting Information

The total benefits over time from hunting and tourism for each of Namibia's 52 communal conservancies formed by 2012 that have generated some level of benefits (Appendix S1) is available online. The authors are solely responsible for the content and functionality of these materials. Queries (other than absence of the material) should be directed to the corresponding author.

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African Elephant Status Report 2016

An update from the African Elephant Database

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. Bouche

Occasional Paper of the IUCN Species Survival Commission No. 60

SSC Species Survival Commission

AFRICAN ELEPHANT SPECIALIST GROUP

COUNTRY

Namibia

ESTIMATED TOTAL ELEPHANTS

22,754 ± 4,305

GUESSES

90 - 90

GENERAL STATISTICS

Country Area	825,418 km²
Range Area	164,069 km² (20%)
Protected Range	18 %
Information Quality Index (IQI)	0.43
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Namibia's elephants occur across the northern region of the country, mostly in national parks and community areas. Their range encompasses a wide variety of habitats, from the extremely arid north-west Kunene Region to the well-watered Zambezi (formerly Caprivi) Region, where the elephants form part of the KAZA transfrontier population. Although poaching has increased in the Zambezi Region in the past ten years, it is not seen as a significant threat in Etosha National Park or for populations in Khaudum National Park and Kunene Region.

Elephant hunting takes place in Namibia, and the revenue generated provides significant income to community conservancies (Naidoo et al., 2006). From 2007 to 2015, Namibia declared an annual export quota of elephant hunting trophies of 180, defined as tusks from 90 animals (CITES, n.d.-a).

Namibia's elephant management plan was published in 2007 (Ministry of Environment and Tourism, 2007).

In 2008, Namibia undertook an approved one-off sale of 7,503 kg of ivory to Japan and China, at a price of USD $1,147,369 (Wijnstekers, 2011).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Namibia is 22,754 ± 4,305 at the time of the last survey for each area. There may be an additional 90 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 84,283 km^2, which is 52% of the estimated known and possible elephant range. There remains an additional 48% of the estimated range for which no elephant population estimates are available.

The elephant population of Namibia has continued to increase although, with wide confidence limits in aerial surveys and elephants moving across international borders, it is not possible to be precise about how great the increase in the national population has been.

There are four main populations, the transfrontier population (with Zambia, Angola, Botswana and Zimbabwe) in the Zambezi Region, in Khaudum National Park in the north-east, the Etosha National Park population, and the Kunene population in the north-west which includes the "desert" elephants.

There has been an increasing trend in elephant numbers in the Zambezi Region since surveys started in the 1980s. This is likely to have been a result of both natural growth and movement from neighbouring countries. **Aerial sample counts** were carried out in 2007, 2011, 2013, 2014, and 2015, giving estimates of 8,380, 10,847 ± 3,580, 9,165 ± 2,016, 14,097 ± 2,678 and 13,116 ± 3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725 ± 2,206 (Kolberg, 2004). There was also a total count carried out in 2007 (Chase, 2007) and a sample count in 2008 (Kolberg, 2008). However the latter was carried out with an inexperienced crew and the results were thought to be a considerable underestimate (Kolberg, 2008).

The elephant population of Khaudum NP and the neighbouring community conservancies of Nyae Nyae and N≠a Jaqna have been established since the 1980s, with the provision of artificial water and movements across the border from Botswana. Three **aerial sample counts** were carried out in 2011, 2013 and 2015 giving estimates of 4,731 ± 1,940, 3,638 ± 1,164, and 6,413 ± 2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758 ± 2,289 for Khaudum, 61 ± 115 for N#a Jaqna (Kolberg, 2004) and 967 ± 481 for Nyae Nyae (Stander, 2004). None of these are significant differences.

There is a limited movement of elephants between Angola and the Kavango region to the north-west of Khaudum (Terblanche, 2016).

There is a small elephant population in the Mangetti area between Khaudum and Etosha. The AESR 2007 indicated that they occupy the Mangetti Game Reserve, whereas their range is actually concentrated around the Mangetti Cattle Ranch to the west, and also probably extends into the Ukwuangali communal area to the north. Ninety individuals were observed in Mangetti in 2015 (Lindeque, pers. comm., 2016). This **informed guess** replaces one of 20 from 2005 (Ministry of Environment and Tourism, 2005).

NUMBERS AND DISTRIBUTION
CONT.

Etosha National Park in northern Namibia has an increasingly isolated elephant population, since the perimeter fencing has been upgraded in recent years. There has been a gradual increase in elephant numbers, moderated by deaths from anthrax and poaching. Aerial sample counts were carried out in 2011 and 2012, giving estimates of 3,378 ± 1,756 and 2,810 (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of 2,911 ± 637 (Kilian, 2015) and replaces an estimate of 2,057 ± 598 from 2004 (Kilian & Kolberg, 2004).

It is technically very difficult to count the widely scattered elephant population in the Kunene Region, which includes the 'desert elephants' in the dry, western extremity of the range and there has been controversy about the numbers in this area. A combined sample block count and **aerial total count** was carried out by helicopter in 2011, giving an estimate of 314 ± 154 (MET, 2012). This replaces an estimate of 210 ± 157 from a 2005 survey (Ministry of Environment and Tourism, 2005). It should be noted that the count did not include the extreme northern part of the range around Opuwo, nor the farms to the south of Etosha. There has been some range expansion to both the south and north, with elephants now being resident in the Ugab river basin and about ten elephants resident in the northern Etanga area (Owen-Smith, pers. comm., 2014). The area of **known range** has been changed, and the Etanga group is shown as a point record on the map. The Kunene population appears to have been increasing in numbers and range, despite evidence that the 'desert elephant' sub-population in the Hoanib and Hoarusib dry riverbeds reduced from 42 to 31 between 2002 and 2015 (Ramey & Brown, 2015).

There are occasional sightings of elephants in livestock ranching areas to the south of their normal range in the area north and east of Windhoek. These are shown as point records on the range map (Hartman, 2014; The Namibian, 2014).

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
Totals 2015	**22,754**	**4,305**	**90**	**90**		
Totals 2006	**15,807**	**3,276**	**20**	**20**		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
Total Range					100 %	164,069

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
Totals	+6,947	±5,410	+70	+70	52 %	84,283

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Direct Sample and Reliable Dung	65,438	2,683	68,121
Informed Guesses	15,903	259	16,162
Unassessed Range	31,130	48,655	79,786
Totals	112,471	51,598	164,069

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB	YEAR	ESTIMATE	95% CI			(km²)	LON	LAT
Etosha National Park	RS	AS	B	2015	2,911	637	Kilian, 2015	1	18,549	15.8°E	19.0°S
Khaudum-Kavango	RS	AS	B	2015	4,149	1,864	Gibson & Craig, 2015b	2	5,843	20.7°E	19.3°S
Kunene	RS	AS	B	2011	314	154	MET, 2012	1	40,887	14.1°E	20.0°S
Mangetti Area	NG	O	D	2015	90		Lindeque, pers. comm., 2016	2	2,558	18.5°E	18.6°S
Nyae Nyae Conservancy	RS	AS	B	2015	2,264	1,729	Gibson & Craig, 2015b	2	7,001	20.7°E	19.3°S
Zambezi Region	RS	AS	B	2015	13,116	3,413	Gibson & Craig, 2015b	1	17,473	23.5°E	17.9°S

*RANGE OF INFORMED GUESS

*KEY TO REASONS FOR CHANGE

DA: Different Area; DD: Data Degraded; DT: Different Technique; NA: New Analysis; NG: New Guess; NP: New population; PL: Population Lost; RS: Repeat Survey (RS denotes a repeat survey that is not statistically comparable for reasons such as different season);
— : No Change

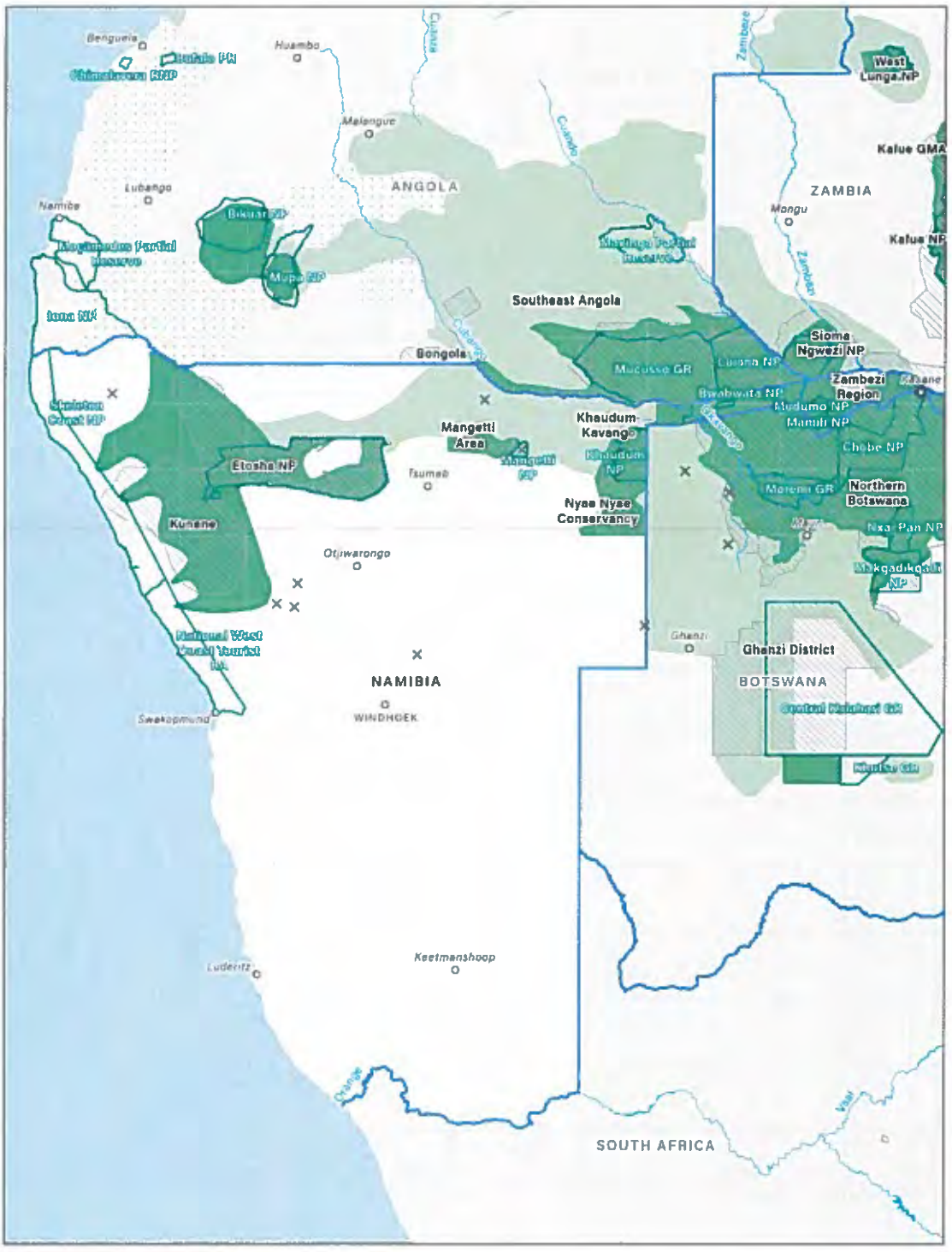
*KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

*PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

Namibia



0 90 180 270 360 450 540km

ABBREVIATIONS AND ACRONYMS

See Appendix III for map abbreviations and acronyms

AfESG

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Int'l Boundaries
Rivers & Lakes
Towns
Protected Areas
Input Zones

ELEPHANT RANGE

Known
Possible
Doubtful
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

Share / Save

Salambala Conservancy

Named after the lovers Sala and Bala whose illicit relationship resulted in them being banished to the forest

Quick facts

Registered:	June 1998
Region:	Zambezi
Area:	930 km²
Approximate population:	8,553
Geographical features:	Average annual rainfall of 600 mm. Mopane woodland dominates the northern area, while floodplain grasslands cover the southern section.
Particular features:	

Quick links

Ministry of Environment and Tourism (MET) website

MET regional offices

Photo Library

Elephant in Zambezi region

NACSO full members

IRDNC

LAC

NDT

CCF

MRCC-UNAM

» See all NACSO members

NACSO partners

Funding partners

Hunting partners

Tourism partners

Government Agencies

Where we are

Location of...

Website by JARO Consultancy

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2016 Annual Conservancy Audit Report

Salambala
Status Summary & Natural Resource Report

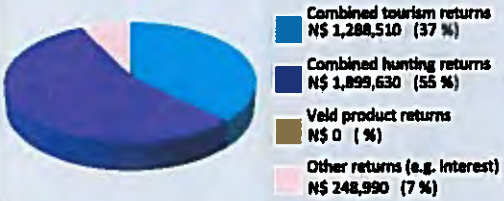
maximising wildlife returns by minimising threats...

Conservancy status summary

Returns from natural resources in 2016

the chart shows the main sources of returns and values and their percentage of the total returns

Approximate Total Returns N$ 3,437,130



Two of the most significant returns for the conservancy:

✓cash income to the conservancy to cover running costs and invest in developments

✓Employment to conservancy residents

Conservancy income			N$ 2,006 450
Employment	Private Sector	52 staff	N$ 1,302,080
	Conservancy	37 staff	N$ 1,071,460

Cost of natural resource conflicts in 2016

estimates are based on average national values

Estimated human wildlife conflict cost	N$ 49,970
Estimated poached high value species loss	N$ 0
Total conflict cost estimate	**N$ 49,970**

Natural resource cost–return ratio in 2016

the chart shows the approximate ratio of returns to costs

Natural resource returns outweigh approximate conflict costs

Total returns: N$ 3,437,130

Approximate conflict costs: N$ 49,970

Approximate positive ratio 69 : 1

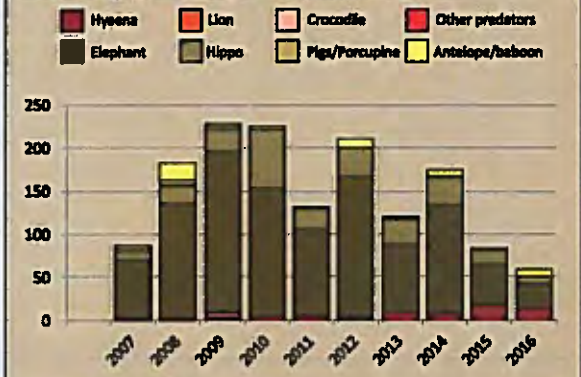
Management performance in 2016

Category	Performance
1 Adequate staffing	
2 Adequate expenditure	
3 Audit attendance	
4 NR management plan	
5 Zonation	
6 Leadership	
7 Display of material	
8 Event Book modules	
9 Event Book quality	
10 Compliance	
11 Game census	
12 Reporting & adaptive mment	
13 Law enforcement	
14 Human Wildlife Conflict	
15 Harvesting management	
16 Sources of NR income	
17 Benefits produced	
18 Resource trends	
19 Resource targets	

Human wildlife conflict

Human wildlife conflict trend

the chart shows the total number of incidents each year, subdivided by species, grouped as herbivores and predators

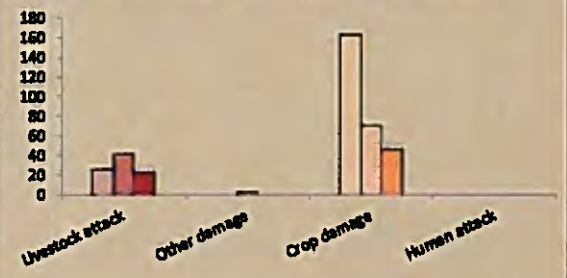


Most troublesome problem animals 2014-2016

the chart shows the number of incidents per species for the last 3 years; the darkest bar (on the right) indicates the current year for each species

Type of damage by problem animals 2014-2016

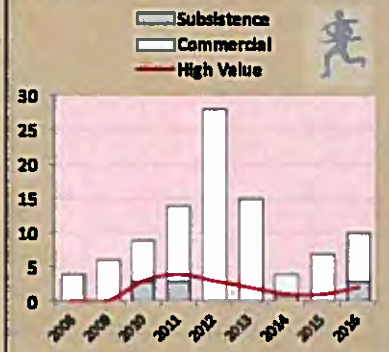
the chart shows the number of incidents per category for the last 3 years; the darkest bar (on the right) indicates the current year for each type



Poaching

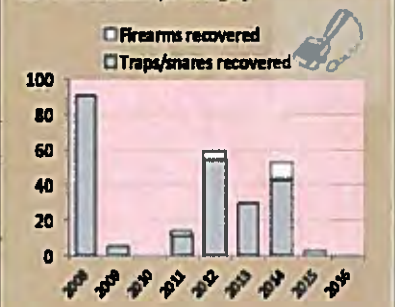
Number of Incidents per year

Commercial poaching is a serious threat to conservancy benefits. The chart shows the number of incidents per category



Traps and firearms recovered

number of incidents per category



Arrests and convictions

number of incidents per category

Wildlife removals – quota use and value

Species	Quota 2016			Animals actually used in 2016						Potential Trophy Value N$	Potential Other use Value N$
	Total	Trophy	Other Use	Trophy	Own Use & Premium	Shoot & Sell	Capture & Sale	Problem Animal	Total Use		
Baboon	2	2		1					1	500	
Buffalo	4	3	1	2	1				3	70,000	5,500
Crocodile	2	2		2					2	25,500	
Elephant*	11	6	5	6	4				11	200,000	450,000
Hippo	5	2	3	2	2			1	6	25,000	5,500
Hyaena	1	1								5,000	
Impala	25	10	15	3					3	2,700	680
Kudu*	6	2	4		3				3	5,000	19,400
Warthog	13	3	10	2	3				5	2,200	400
Waterbuck*	2	2		2	4				6		
Blue Wildebeest*	11	3	8	2	7				9	3,800	29,800
B. Zebra	40	10	30	8					8	3,500	3,500

2016

Salambala

Natural Resource Report continued...

Not all data or species are shown on this report; use your Event Book for more information

monitoring numbers and trends for a healthy conservancy...

Current wildlife numbers and status

Species	Animals Seen	Estimate	Wildlife Status: Count Trend	Wildlife Status: National Guideline	Wildlife Status: Desired Number
B. Zebra	338	350			
Duiker	2	260			
Elephant	57	?			
Giraffe	12	?			
Impala	173	?			
Kudu	28	240			
Roan					
Sable					
Steenbok					
Warthog	37	1000			

Wildlife Status

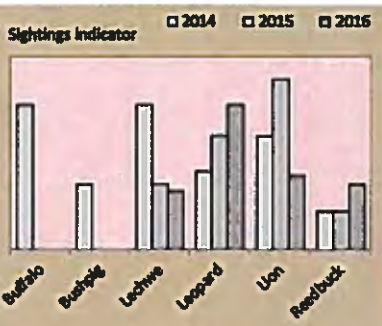
Count trend – gives the species status in the conservancy based on game count trend data.

National guideline – gives the species status in the conservancy using national guidelines for the conservancy; for example, lions may cause local problems, but are of high value and are rare at landscape level.

Desired number – gives the species status in the conservancy based on what the conservancy would like to have.

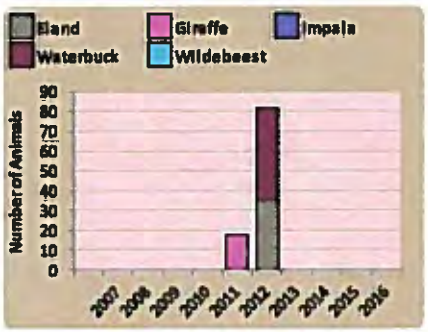
dark green (abundant) – there should be less;
light green (common) – the desired number is reached;
yellow (uncommon) – there should be more;
light orange (rare) – there should be more than double;
dark orange (very rare) – there should be more than triple;
red (extinct) – the species needs to be reintroduced.

Locally rare species

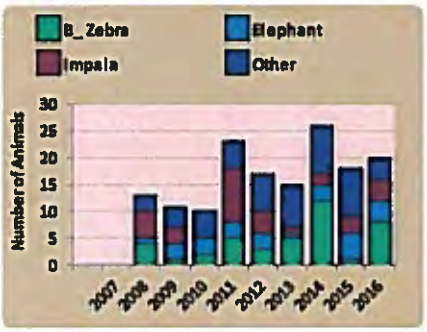


Locally rare and endangered species are not found very often in the conservancy and need special conservation attention.

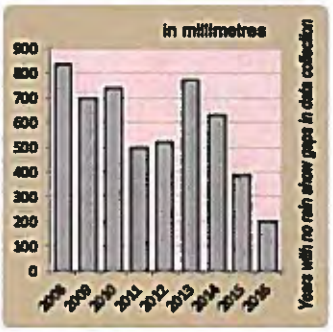
Wildlife introductions



Wildlife mortalities

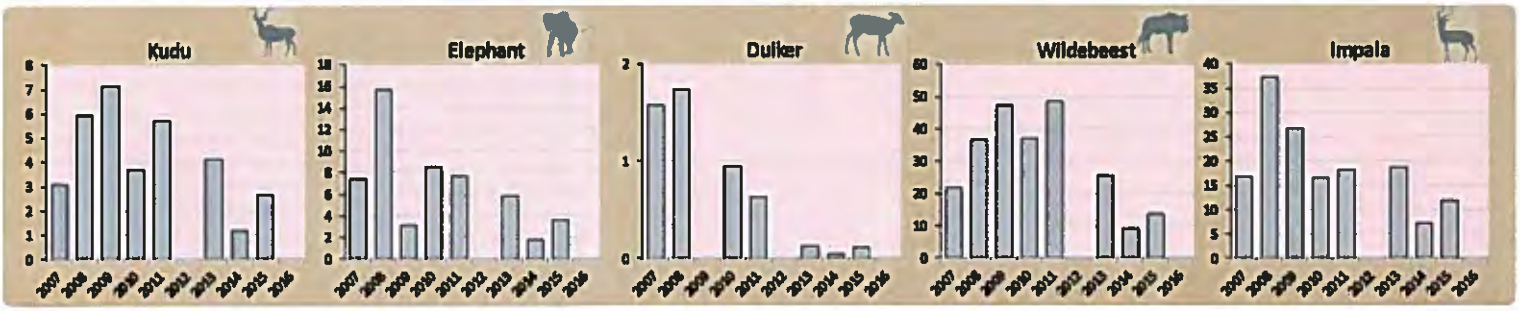


Annual rainfall



Fixed route patrols

charts show the number of sightings of each species per fixed route foot patrol each year

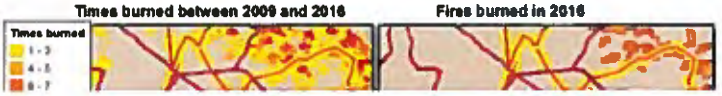


Predator monitoring

charts show the average number of animals seen per Event Book each year
status barometers reflect the general sightings trend over the last 5 years

Vegetation monitoring

Fire monitoring



2016 Annual Conservancy Audit Report

Salambala Institutional Report

Not all institutional data are shown on this report: use your governance institution audit for more information

Enabling wise conservancy governance...

Conservancy statistics

Date Registered:	June 1998
Population (2011 census):	8240
Size (square kilometres):	930

Constitutional adherence

Approved constitution	✔
AGM held	✔
Management and utilisation plan	✔
Financial annual report approved at AGM	✔
Financial report external review	✖
Benefit distribution plan	✔

Conservancy Governance

Number of management committee members:	35
Date of last AGM:	Fri, December 2, 2016
Attendance at AGM:	Men: 82; Women: 59
Date of next AGM:	

Other important issues

Budget approved?	✔
Work plan approved?	✔

Employment

Conservancy staff: Male	27
Female	10
Community game guards:	20
Community resource monitors:	1
Lodge staff: Male	0
Female	0

Benefits

Cash	In Kind
Traditional Authority	
Community Projects	Cash Distribution
Other Benefits	Meat Distribution
Haccia	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.

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry U.S. Fish and Wildlife Service Prt # 90682C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Wed, Oct 2, 2019 at 10:36 AM
To: (b) (6) permits@conservationforce.com

Dennis,

On **05/15/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 90682C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

Re: [EXTERNAL] Re: Elephant Withdrawal Inquiry U.S. Fish and Wildlife Service Prt # 90682C

MacDonald, Tim <tim_macdonald@fws.gov>
Mon 11/4/2019 3:11 PM
To: Dennis Hirschfeld (b) (6)

Thank you for you reply.

Thank you,

Tim Mac Donald

Government Information Specialist
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 Mon, Nov 4, 2019 at 2:40 PM Dennis Hirschfeld (b) (6) > wrote:

> Sorry for the delay in responding . I was not successful on the hunt . Please withdraw the application.
>
> Thanks
> dch
>
> Sent from my iPhone
>
> > On Oct 2, 2019, at 9:36 AM, MacDonald, Tim <tim_macdonald@fws.gov> wrote:
> >
> > Dennis,
> >
> > On **05/15/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 90682C**. At the me of the applic aon' s submission the hunt was to be held at a future date.
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> >
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Please confirm the current status.

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Thank you,

Tim Mac Donald

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Division of Management Authority
Branch of Permits; MS: IA
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5275 Leesburg Pike
Falls Church, VA 22041-3805

(w) 703-358-2256
(F) 703-358-2280

RCVD MAY 15 20

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Palmer	Jeffery	Wayne	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Mapleton	UT	84664-4911	Utah	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 05/05/2018

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)?

   Jeffery Palmer, Tel (b) (6) [redacted]

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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:

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:

Bushmanland, Namibia

b. Date wildlife was hunted:

6/20/2016

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

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]:

Highveld Taxidermists (Pty) Ltd.354, Vlakplaats, Hennopsriver 0023, 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:	
Business Name:	Highveld Taxidermist (Pty) Ltd.
Address:	354 Vlakplaats Hennopsriver
City:	Grasmia
State/Province:	Pretoria
Country, Postal Code:	South Africa (ZA)

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

a. Do you have any information regarding the population status or trend data on the species hunted?

I understand that in Namibia, elephant harvesting is strictly controlled to allow the species to thrive and to strike a balance between the needs of the elephants and the local population. I am told that the elephant population there has increase through such measures.

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 US$90,000 for my hunt. I was informed that these funds were distributed among the local tribes and government to help with conservation as well as improve the education system in the 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

I do not have this information.

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of 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 signatu[redacted] Date: 5-5-2018

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.

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).

PERMIT / CERTIFICATE 168494

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

☐ EXPORT
☐ RE-EXPORT
☒ IMPORT
☐ OTHER

ORIGINAL

2. Valid until 21 / 08 / 2017

3. Importer (name and address)
Jeffery Wayne Palmo
c/o Highveld Taxidermists
354 Vlakplaats, Hennopsriver
Grasmia 0023 PRETORIA

3a. Country of import RSA

4. Exporter / Re-exporter (name, address and country)
B. H. Van Heerden
Windhoek
NAMIBIA

5. Special conditions NA 0051803 dd 20/01/2017
Invalid without attached permit conditions (page 2 of 2 integrated permit document attached)

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) H

5b. Security stamp No. 1360537

	7.a 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	Trunk	II W	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 ***				
B	7.a	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.a	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.a	9.	10.	11.	11a.
	12. Country of origin* / Permit No. / Date / 12a. Country of last re-export / Certificate No / Date / 12b. No. of the operation ** or date of acquisition ***				

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)
** Only for specimens of Appendix I species bred in captivity or artificially propagated for commercial purposes
*** For Pre-Convention specimens

13. THIS PERMIT / CERTIFICATE IS ISSUED BY: LA Lötter

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
22 FEB 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

CITES 1360537

Pretoria — Place
22/02/2017 — Date
Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	1
B	
C	
D	

15. Bill of Lading/Air Waybill Number: 083 34334193
Import inspected (24-06-2017) Masito

Hair — Port of Export
31.05.17 — Date
Signature
Official stamp and title

MINISTRY OF AGRICULTURE, FORESTRY AND FISHERIES 2017 -06- 21

V & R Printing Works (Pty) Ltd (012) 333 2462 (2821)

PERMIT / CERTIFICATE 168494

16494

CONDITIONS FOR PERMIT NO./s .....

PERMIT CONDITIONS FOR THE NATIONAL/ INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NON-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH

These conditions will be applicable to all National/ International Imports, Exports and Re-Exports of CITES and Non-CITES species and any products thereof; live wild animals, live exotic animals, hunting trophies, wild animal products, protected plants and live fish by air, mail, rail and road within the Gauteng Province of which the first port of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

Import permits are not valid unless the imported consignment is accompanied by a valid ***(original)*** export permit from the country/ province of origin ***(if required)***, which must be handed to the authorized Environmental Management Inspector on inspection.

THE FOLLOWING CONDITIONS ARE APPLICABLE TO:

(A) ALL NATIONAL/ INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR, MAIL, RAIL, ROAD)

THIS PERMIT:

1. a) Shall not be transferable;
   b) Shall be invalid until the signature of the holder/ Recipient thereof been appended thereto;
   c) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspector/ official prior to the import, export or re-export taking place. In cases of importation of live animals, which are to be quarantined at OR Tambo International Airport's Quarantine Station, the permit must be released prior to the animals leaving quarantine. Original import permits to be inserted into a sealed envelope and placed in the Environmental Management Inspector box that's provided at the quarantine station, no more than 14 working days after import;
   d) Shall be subject to the provisions of any other law and or regulation;
   e) Shall be valid for one consignment only;
   f) This permit is subject to the compliance of Veterinary and Agricultural requirements; and to the compliance of IATA Live Animal Regulations.

2. The permit holder or his delegated agent must contact one of the authorized Environmental Management Inspector/ officials, per telephone ***and*** confirm per fax a minimum of ***48 hours*** prior to the import, export or re-export taking place to book an inspection (the inspection booking must be requested a minimum of 48 hours prior to the intended inspection), applicable for shipments done over weekends and public holidays, with the following information:
   a) Name / Company Name of Importer / Exporter;
   b) Name of Airline and Warehouse where intended inspection will take place;
   c) Date and Time of Import / Export / Re-Export;
   d) Date and Time of intended inspection (subject to approval);
   e) Agents particulars (if applicable), Carrier Name, Flight Number, Flight Time and Waybill Number;
   f) The applicable permit number/s and relevant expiry dates; and
   g) Detailed packing list as per condition 6.

3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspector/ official may be contacted at the following telephone numbers during office hours ***(07:00 – 15:30):***
   Office: **+27 (11) 390-3687/ 2311**
   Fax: **+27 (11) 390-1720**

4. All relevant documentation, including ***original*** permit/s ***(CITES permits must include original and coloured copy)***, Packing List/s, A photo copy of all these documents must also be handed to the Environmental Management Inspector/ official on inspection. The original permit/s, these conditions and packing list/s must accompany the consignment/s.

5. All transport containers must be numbered and the numbers must coincide with the numbers on the packing list/s. The country/ province of destination as shown on the containers must coincide with the country/ province of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s.

6. Detailed packing list/s, that are signed and dated must accompany the consignment/s, with the following information:
   a) Details of Importer and Exporter (Names, addresses and contact numbers);
   b) Waybill number/s and name of carrier, flight number, date and time;
   c) Transport container number/s;
   d) Scientific name of species (in full) with relevant transponder / tag / ring numbers; a detailed description of specimen / product and the origin thereof;
   e) Common name of species (in full);
   f) Number per species per container (actual number exported / imported); and
   g) Applicable permit number/s

7. If this permit is not used, the ***original permit (CITES permits must include coloured copy)*** must be returned to the issuing authority within ***14 working*** days after expiry thereof. Import permits must be returned to the issuing authority within ***14 working days*** after use. Export permits must be handed to a Management Authority of the importing country/ province within ***14 working days*** after use.

8. The permit holder must make and retain photo copies of permit/s for audit inspections. Copies of import permits must be made and retained ***after endorsement,*** for Re-export permit applications. When applying for a Re-export permit, a copy of the ***endorsed import permit*** must be submitted to the Permit office with the application.

9. A person authorized thereto by the Premier may only make any alteration on the permit.

10. Failure to comply with any of the permit conditions renders the permit invalid and may result in criminal proceedings, cancellation of the permit/s and seizure of the consignment/s.

11. The holder of the permit and / or his/ her delegated agent will be held responsible for any legal costs; costs incurred for delays and / or storage fees due to irregularities and / or due to the consignment being withheld due to incorrect documentation, and / or incorrect consignment/s and / or failure to comply with permit conditions.

12. Permit holders or their delegated agents must inform the Environmental Management Inspector/ official if an inspection is cancelled, or if they are to be late for an inspection within a reasonable time before the inspection is due to take place.

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
22 FEB 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
PRIVATE BAG X20601 HATFIELD PRETORIA 0028

Signature of Issuing Officer	Date	Signature of Recipient	Date
LA Lötter		Carla Fernandes	9-3-17
Full Name		Full Name	

Conditions to this permit have been issued subject to the provisions of section 100 (2), Ordinance 12 of 1983; the National Environmental Management: Biodiversity Act, 2004; the Threatened or Protected Species Regulations, 2007 and the Convention on International Trade in Endangered Species Regulations, 2010.

PERMIT / CERTIFICATE 168495

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

☐ EXPORT
☐ RE-EXPORT
☒ IMPORT
☐ OTHER

ORIGINAL

2. Valid until 21/08/2017

3. Importer (name and address)
Jeffery Wayne Palmer
c/o Highveld Taxidermists
354 Vlakplaats, Hennopsrivier
Erasmia 0023 PRETORIA

3a. Country of import RSA

4. Exporter / Re-exporter (name, address and country)
B.H. Van Heerden
Windhoek
NAMIBIA

5. Special conditions NA 0051803 dd 20/01/2017
Invalid without attached permit conditions (page 2 of 2) Integrated permit doc attached

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) H

5b. Security stamp No. 1360538

	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	(Loxodonta africana) African elephant NA 16 0031 25.45 NA 16 0032 34.65	9. Tusks	10. II W	11. 2 (Two)	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	(Loxodonta africana) African elephant	9. Ears	10. II W	11. 2 (Two)	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	(Loxodonta africana) African elephant	9. Feet	10. II W	11. 4 (Four)	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	(Loxodonta africana) African elephant	Head and lip skin	10. II W	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 ***				

* 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

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
22 FEB 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

13. THIS PERMIT / CERTIFICATE IS ISSUED BY: LA Lötter

Pretoria — Place
22/02/2017 — Date
Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	2
B	2
C	4
D	1

15. Bill of Lading/Air Waybill Number 083-3433 4193
Import inspected - 14-06-2017

Hair — Port of Export
31.05.17 — Date
Signature
Official stamp and title

2017 -05- 31

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621)

PERMIT / CERTIFICATE 168495

168495

CONDITIONS FOR PERMIT NO./s .....

PERMIT CONDITIONS FOR THE NATIONAL/ INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NON-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH

These conditions will be applicable to all National/ International Imports, Exports and Re-Exports of CITES and Non-CITES species and any products thereof; live wild animals, live exotic animals, hunting trophies, wild animal products, protected plants and live fish by air, mail, rail and road within the Gauteng Province of which the first port of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

Import permits are not valid unless the imported consignment is accompanied by a valid ***(original)*** export permit from the country/ province of origin ***(if required)***, which must be handed to the authorized Environmental Management Inspector on inspection.

THE FOLLOWING CONDITIONS ARE APPLICABLE TO:

(A) ALL NATIONAL/ INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR, MAIL, RAIL, ROAD)

THIS PERMIT:

1. a) Shall not be transferable;
   b) Shall be invalid until the signature of the holder/ Recipient thereof been appended thereto;
   c) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspector/ official prior to the import, export or re-export taking place. In cases of importation of live animals, which are to be quarantined at OR Tambo International Airport's Quarantine Station, the permit must be released prior to the animals leaving quarantine. Original import permits to be inserted into a sealed envelope and placed in the Environmental Management Inspector box that's provided at the quarantine station, no more than 14 working days after import;
   d) Shall be subject to the provisions of any other law and or regulation;
   e) Shall be valid for one consignment only;
   f) This permit is subject to the compliance of Veterinary and Agricultural requirements; and to the compliance of IATA Live Animal Regulations.

2. The permit holder or his delegated agent must contact one of the authorized Environmental Management Inspector/ officials, per telephone ***and*** confirm per fax a minimum of ***48 hours*** prior to the import, export or re-export taking place to book an inspection (the inspection booking must be requested a minimum of 48 hours prior to the intended inspection), applicable for shipments done over weekends and public holidays, with the following information:
   a) Name / Company Name of Importer / Exporter;
   b) Name of Airline and Warehouse where intended inspection will take place;
   c) Date and Time of Import / Export / Re-Export;
   d) Date and Time of intended inspection (subject to approval);
   e) Agents particulars (if applicable), Carrier Name, Flight Number, Flight Time and Waybill Number;
   f) The applicable permit number/s and relevant expiry dates; and
   g) Detailed packing list as per condition 6.

3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspector/ official may be contacted at the following telephone numbers during office hours ***(07:00 – 15:30):***
   Office: +27 (11) 390-3687/ 2311
   Fax: +27 (11) 390-1720

4. All relevant documentation, including ***original*** permit/s ***(CITES permits must include original and coloured copy)***, Packing List/s, A photo copy of all these documents must also be handed to the Environmental Management Inspector/ official on inspection. The original permit/s, these conditions and packing list/s must accompany the consignment/s.

5. All transport containers must be numbered and the numbers must coincide with the numbers on the packing list/s. The country/ province of destination as shown on the containers must coincide with the country/ province of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s.

6. Detailed packing list/s, that are signed and dated must accompany the consignment/s, with the following information:
   a) Details of importer and Exporter (Names, addresses and contact numbers);
   b) Waybill number/s and name of carrier, flight number, date and time;
   c) Transport container number/s;
   d) Scientific name of species (in full) with relevant transponder / tag / ring numbers; a detailed description of specimen / product and the origin thereof;
   e) Common name of species (in full);
   f) Number per species per container (actual number exported / imported); and
   g) Applicable permit number/s

7. If this permit is not used, the ***original permit (CITES permits must include coloured copy)*** must be returned to the issuing authority within ***14 working*** days after expiry thereof. Import permits must be returned to the issuing authority within ***14 working days*** after use. Export permits must be handed to a Management Authority of the importing country/ province within ***14 working days*** after use.

8. The permit holder must make and retain photo copies of permit/s for audit inspections. Copies of import permits must be made and retained ***after endorsement,*** for Re-export permit applications. When applying for a Re-export permit, a copy of the ***endorsed import permit*** must be submitted to the Permit office with the application.

9. A person authorized thereto by the Premier may only make any alteration on the permit.

10. Failure to comply with any of the permit conditions renders the permit invalid and may result in criminal proceedings, cancellation of the permit/s and seizure of the consignment/s.

11. The holder of the permit and / or his/ her delegated agent will be held responsible for any legal costs; costs incurred for delays and / or storage fees due to irregularities and / or due to the consignment being withheld due to incorrect documentation, and / or incorrect consignment/s and / or failure to comply with permit conditions.

12. Permit holders or their delegated agents must inform the Environmental Management Inspector/ official if an inspection is cancelled, or if they are to be late for an inspection within a reasonable time before the inspection is due to take place.

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769 JOHANNESBURG 2000

22 FEB 2017

Signature of Issuing Office ..... Date .....

LA Lötter
Full Name .....

Export No: 35

9-3-17

Signature of Recipient ..... Date .....

Full Name .....

Conditions to this permit have been issued subject to the provisions of section 100 (2), Ordinance 12 of 1983; the National Environmental Management: Biodiversity Act, 2004; the Threatened or Protected Species Regulations, 2007 and the Convention on International Trade In Endangered Species Regulations, 2010.

PERMIT / CERTIFICATE 168504

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

- [ ] EXPORT
- [ ] RE-EXPORT
- [x] IMPORT
- [ ] OTHER

ORIGINAL

2. Valid until 22/08/2017

3. Importer (name and address) Jeffery Wayne Palmer
c/o Highveld Taxidermists
Farm 354 Vlakplaats
Hennopsriver Gauteng 0023
RSA

3a. Country of import

4. Exporter / Re-exporter (name, address and country)
B. A. Van Heerden
Windhoek
NAMIBIA

5. Special conditions NA 0051803 dd 20/01/2017
Invalid without attached permits conditionspage 2 of 2 Integrated permit dol attached
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) H

5b. Security stamp No. 1360546

	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	(Loxodonta africana) African elephant	Tail	10. II W	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 ***	
B	(Loxodonta africana) African elephant	Leg bone	10. II W	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	(Loxodonta africana) African elephant	Shoulder skin	10. II W	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	(Loxodonta africana) African elephant	Skin	10. II W	11. 6(Six)	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

MPUMALANGA PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
23 FEB 2017
DIRECTORATE OF CONSERVATION PERMITS OFFICE
P.O. BOX 6769, JOHANNESBURG 2000

1360546

13. THIS PERMIT / CERTIFICATE IS ISSUED BY:
LA Lotter
Pretoria — Place
23/02/2017 — Date
Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	1
B	1
C	1
D	6

15. Bill of Lading/Air Waybill Number: 083 3433 4193
Import inspected 14-06-2017
Hair — Port of Export
31.05.17 — Date
Signature
Official stamp and title

Customs Clearance 2017 -05- 31

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621)

PERMIT / CERTIFICATE 168504

185504

CONDITIONS FOR PERMIT NO./s .....

PERMIT CONDITIONS FOR THE NATIONAL/ INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NON-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH

These conditions will be applicable to all National/ International Imports, Exports and Re-Exports of CITES and Non-CITES species and any products thereof; live wild animals, live exotic animals, hunting trophies, wild animal products, protected plants and live fish by air, mail, rail and road within the Gauteng Province of which the first port of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

Import permits are not valid unless the imported consignment is accompanied by a valid ***(original)*** export permit from the country/ province of origin ***(if required)***, which must be handed to the authorized Environmental Management Inspector on inspection.

THE FOLLOWING CONDITIONS ARE APPLICABLE TO:

(A) ALL NATIONAL/ INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR, MAIL, RAIL, ROAD)

THIS PERMIT:

1. a) Shall not be transferable;
   b) Shall be invalid until the signature of the holder/ Recipient thereof been appended thereto;
   c) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspector/ official prior to the import, export or re-export taking place. In cases of importation of live animals, which are to be quarantined at OR Tambo International Airport's Quarantine Station, the permit must be released prior to the animals leaving quarantine. Original import permits to be inserted into a sealed envelope and placed in the Environmental Management Inspector box that's provided at the quarantine station, no more than 14 working days after import;
   d) Shall be subject to the provisions of any other law and or regulation;
   e) Shall be valid for one consignment only;
   f) This permit is subject to the compliance of Veterinary and Agricultural requirements; and to the compliance of IATA Live Animal Regulations.

2. The permit holder or his delegated agent must contact one of the authorized Environmental Management Inspector/ officials, per telephone ***and*** confirm per fax a minimum of ***48 hours*** prior to the import, export or re-export taking place to book an inspection (the inspection booking must be requested a minimum of 48 hours prior to the intended inspection), applicable for shipments done over weekends and public holidays, with the following information:
   a) Name / Company Name of Importer / Exporter;
   b) Name of Airline and Warehouse where intended inspection will take place;
   c) Date and Time of Import / Export / Re-Export;
   d) Date and Time of intended inspection (subject to approval);
   e) Agents particulars (if applicable), Carrier Name, Flight Number, Flight Time and Waybill Number;
   f) The applicable permit number/s and relevant expiry dates; and
   g) Detailed packing list as per condition 6.

3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspector/ official may be contacted at the following telephone numbers during office hours ***(07:00 – 15:30)***:
   Office: +27 (11) 390-3687/ 2311
   Fax: +27 (11) 390-1720

4. All relevant documentation, including ***original*** permit/s ***(CITES permits must include original and coloured copy)***, Packing List/s, A photo copy of all these documents must also be handed to the Environmental Management Inspector/ official on inspection. The original permit/s, these conditions and packing list/s must accompany the consignment/s.

5. All transport containers must be numbered and the numbers must coincide with the numbers on the packing list/s. The country/ province of destination as shown on the containers must coincide with the country/ province of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s.

6. Detailed packing list/s, that are signed and dated must accompany the consignment/s, with the following information:
   a) Details of Importer and Exporter (Names, addresses and contact numbers);
   b) Waybill number/s and name of carrier, flight number, date and time;
   c) Transport container number/s;
   d) Scientific name of species (in full) with relevant transponder / tag / ring numbers; a detailed description of specimen / product and the origin thereof;
   e) Common name of species (in full);
   f) Number per species per container (actual number exported / imported); and
   g) Applicable permit number/s

7. If this permit is not used, the ***original permit (CITES permits must include coloured copy)*** must be returned to the issuing authority within ***14 working*** days after expiry thereof. Import permits must be returned to the issuing authority within ***14 working days*** after use. Export permits must be handed to a Management Authority of the importing country/ province within ***14 working days*** after use.

8. The permit holder must make and retain photo copies of permit/s for audit inspections. Copies of import permits must be made and retained ***after endorsement***, for Re-export permit applications. When applying for a Re-export permit, a copy of the ***endorsed import permit*** must be submitted to the Permit office with the application.

9. A person authorized thereto by the Premier may only make any alteration on the permit.

10. Failure to comply with any of the permit conditions renders the permit invalid and may result in criminal proceedings, cancellation of the permit/s and seizure of the consignment/s.

11. The holder of the permit and / or his/ her delegated agent will be held responsible for any legal costs; costs incurred for delays and / or storage fees due to irregularities and / or due to the consignment being withheld due to incorrect documentation, and / or incorrect consignment/s and / or failure to comply with permit conditions.

12. Permit holders or their delegated agents must inform the Environmental Management Inspector/ official if an inspection is cancelled, or if they are to be late for an inspection within a reasonable time before the inspection is due to take place.

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE
2017

Signature of Issuing Officer	23 FEB 2017	Signature of Recipient	9-3-17
LA Cotter	Date	Full Name	Date
Full Name	DIRECTORATE OF CONSERVATION PERMITS OFFICE P.O. BOX 8769 JOHANNESBURG 2000		

Hosea RE

Conditions to this permit have been issued subject to the provisions of section 100 (2), Ordinance 12 of 1983; the National Environmental Management: Biodiversity Act, 2004; the Threatened or Protected Species Regulations, 2007 and the Convention on International Trade in Endangered Species Regulations, 2010.

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

PERMIT / CERTIFICATE No.

0051803

[X] EXPORT
[ ] RE-EXPORT
[ ] IMPORT
[ ] OTHER:

Original

2. Valid until: 20/07/2017

3. Importer (name and address)
Jeffery Wayne Palmer
Highveld Taxidermy
Farm 354. Vlakplaats
Hennopsriver 0023

4. Exporter / Re-exporter (name,address and country)
B. H. van Heerden
P. O. BOX 21088
Windhoek
Namibia

(b) (6)

Signature of the applicant

3a. Country of import: South Africa

5. Special conditions
Tusks no's NA 16 0031 25 45 & NA 16 0032 34 65

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 ENVIROMENT AND TOURISM
Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp No: 1504911

	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. 67/90 (2016)
B	7./8. *Loxodonta africana* African elephant	9. 2x ears, 4x feet, 1x head and lip skin & tail	10. II W	11. 8 Item	11a. /
C	7./8. *Loxodonta africana* African elephant	9. leg bone, shoulder skin, 8x skin panel & trunk	10. II W	11. 9 Item	11a. /
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 ***
A							
B							
C							
D							

* 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 progated for commercial purposes
*** for pre-Convention specimens

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA

13. THIS PERMIT IS ISSUED BY: J. Shapi

Windhoek — Place

20/01/2017 — Date

28 JAN 2017

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Landing / Air Waybill Number: 083 3433 4193

Block	Quantity
A	2
B	8
C	9
D	

Hair — Port of Export / Re-export

31.5.17 — Date

Signature

Official stamp and title

Original

Namprint: 2308

PERMIT / CERTIFICATE № 205846

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

- [ ] EXPORT
- [X] RE-EXPORT
- [ ] IMPORT
- [ ] OTHER

ORIGINAL

2. Valid until 18/06/2018

3. Importer (name and address)
Jeffrey Wayne Palmer
(b) (6)
Mapleton, Utah 84664
U.S.A.

4. Exporter / Re-exporter (name, address and country)
Highveld Taxidermy
354 Vlakplaats
Hennopsriver
Gauteng, 0023

3a. Country of Import U.S.A.

5. Special conditions Invalid without attached permit conditions page 2 of 2 and issued document attached ZA 168495 dd 22/02/2017

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) H

5b. Security stamp No. 1369913

	7.a SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	8. 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.a Elephant (Loxodonta africana)	Tusk on base	NA 16 0032 NA 16 0032 II W	1. 25.45 34.65 2 (two)	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 ***	
	NA 0051803 20/01/2017				
B	7.a	8.	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.a	8.	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.a	8.	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 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: O J TSHOLOFO

Pretoria
Place

19/12/17
Date

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
19 DEC 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

1369913

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	
B	
C	
D	

15. Bill of Lading/Air Waybill Number:

Port of Export | Date | Signature | Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2482 (2621)

PERMIT / CERTIFICATE № 205846

PERMIT CONDITIONS FOR THE NATIONAL/ INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NON-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH

These conditions will be applicable to all National/ International Imports, Exports and Re-Exports of CITES and Non-CITES species and any products thereof; live wild animals, live exotic animals, hunting trophies, wild animal products, protected plants and live fish by air, mail, rail and road within the Gauteng Province of which the first port of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

Import permits are not valid unless the imported consignment is accompanied by a valid ***(original)*** export permit from the country/ province of origin ***(if required)***, which must be handed to the authorized Environmental Management Inspector on inspection.

THE FOLLOWING CONDITIONS ARE APPLICABLE TO:

(A) ALL NATIONAL/ INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR, MAIL, RAIL, ROAD)

THIS PERMIT:

1. a) Shall not be transferable;
   b) Shall be invalid until the signature of the holder/ Recipient thereof been appended thereto;
   c) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspector/ official prior to the import, export or re-export taking place. In cases of importation of live animals, which are to be quarantined at OR Tambo International Airport's Quarantine Station, the permit must be released prior to the animals leaving quarantine. Original import permits to be inserted into a sealed envelope and placed in the Environmental Management Inspector box that's provided at the quarantine station, no more than 14 working days after import;
   d) Shall be subject to the provisions of any other law and or regulation;
   e) Shall be valid for one consignment only;
   f) This permit is subject to the compliance of Veterinary and Agricultural requirements; and to the compliance of IATA Live Animal Regulations.

2. The permit holder or his delegated agent must contact one of the authorized Environmental Management Inspector/ officials, per telephone ***and*** confirm per fax a minimum of ***48 hours*** prior to the import, export or re-export taking place to book an inspection (the inspection booking must be requested a minimum of 48 hours prior to the intended inspection), applicable for shipments done over weekends and public holidays, with the following information:
   a) Name / Company Name of Importer / Exporter;
   b) Name of Airline and Warehouse where intended inspection will take place;
   c) Date and Time of Import / Export / Re-Export;
   d) Date and Time of intended inspection (subject to approval);
   e) Agents particulars (if applicable), Carrier Name, Flight Number, Flight Time and Waybill Number;
   f) The applicable permit number/s and relevant expiry dates; and
   g) Detailed packing list as per condition 6.

3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspector/ official may be contacted at the following telephone numbers during office hours ***(07:00 – 15:30)***;
   Office: +27 (11) 390-3687/ 2311
   Fax: +27 (11) 390-1720

4. All relevant documentation, including ***original*** permit/s ***(CITES permits must include original and coloured copy)***, Packing List/s, A photo copy of all these documents must also be handed to the Environmental Management Inspector/ official on inspection. The original permit/s, these conditions and packing list/s must accompany the consignment/s.

5. All transport containers must be numbered and the numbers must coincide with the numbers on the packing list/s. The country/ province of destination as shown on the containers must coincide with the country/ province of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s.

6. Detailed packing list/s, that are signed and dated must accompany the consignment/s, with the following information:
   a) Details of Importer and Exporter (Names, addresses and contact numbers);
   b) Waybill number/s and name of carrier, flight number, date and time;
   c) Transport container number/s;
   d) Scientific name of species (in full) with relevant transponder / tag / ring numbers; a detailed description of specimen / product and the origin thereof;
   e) Common name of species (in full);
   f) Number per species per container (actual number exported / imported); and
   g) Applicable permit number/s

7. If this permit is not used, the ***original permit (CITES permits must include coloured copy)*** must be returned to the issuing authority within ***14 working*** days after expiry thereof. Import permits must be returned to the issuing authority within ***14 working days*** after use. Export permits must be handed to a Management Authority of the importing country/ province within ***14 working days*** after use.

8. The permit holder must make and retain photo copies of permit/s for audit inspections. Copies of import permits must be made and retained ***after endorsement,*** for Re-export permit applications. When applying for a Re-export permit, a copy of the ***endorsed import permit*** must be submitted to the Permit office with the application.

9. A person authorized thereto by the Premier may only make any alteration on the permit.

10. Failure to comply with any of the permit conditions renders the permit invalid and may result in criminal proceedings, cancellation of the permit/s and seizure of the consignment/s.

11. The holder of the permit and / or his/ her delegated agent will be held responsible for any legal costs; costs incurred for delays and / or storage fees due to irregularities and / or due to the consignment being withheld due to incorrect documentation, and / or incorrect consignment/s and / or failure to comply with permit conditions.

12. Permit holders or their delegated agents must obtain the Environmental Management Inspector/ official if an inspection is cancelled, or if they are to be late for an inspection within a reasonable time before the inspection is due to take place.

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF ECONOMIC DEVELOPMENT, ENVIRONMENT AGRICULTURE AND RURAL DEVELOPMENT
19 DEC 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

D JTSHOLOTO
Signature of Issuing Officer — Date

(b) (6)
Signature of Recipient — 2017/12/21 Date

Full Name

Conditions to this permit have been issued subject to the provisions of section 100 (2), Ordinance 12 of 1983; the National Environmental Management: Biodiversity Act, 2004; the Threatened or Protected Species Regulations, 2007 and the Convention on International Trade In Endangered Species Regulations, 2010.

INTEGRATED PERMIT No.: 205846

This is an integrated permit for species listed in the CITES- and Threatened or Protected Species Regulations under the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004).

Signature

Date:

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
19 DEC 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

PERMIT / CERTIFICATE Nº 205848

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

[ ] EXPORT
[X] RE-EXPORT
[ ] IMPORT
[ ] OTHER

ORIGINAL

2. Valid until 18 | 06 | 2018

3. Importer (name and address)
[redacted]
Mapleton
Utah 84664 U.S.A.

3a. Country of import U.S.A.

4. Exporter / Re-exporter (name, address and country)
Highveld Taxidermist (Pty) Ltd
354 Vlakplaats
Hennopsriver
Erasmia 0023

5. Special conditions Invalid without attached permit Conditions (page 2 of 2)
Integrated document attached
AEC ZA 168504 dd 23/02/17
BEC ZA 168495 dd 22/02/17
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) H

5b. Security stamp No. 1369915

	7.a 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.a Elephant (Loxodonta africana)	9. Shoulder mount	10. II W	11. 1 (one)	11a.
	12. Country of origin* NA / Permit No. 0051803 / Date 20/01/17	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ** or date of acquisition ***	
B	7.a Elephant (Loxodonta africana)	9. Foot Lamp	10. II W	11. 2 (two)	11a.
	12. Country of origin* NA / Permit No. 0051803 / Date 20/01/17	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ** or date of acquisition ***	
C	7.a Elephant (Loxodonta africana)	9. Footstool with leather	10. II W	11. 2 (two)	11a.
	12. Country of origin* NA / Permit No. 0051803 / Date 20/01/17	12a. Country of last re-export / Certificate No. / Date		12b. No. of the operation ** or date of acquisition ***	
D	7.a Elephant (Loxodonta africana)	9. Leather Pieces	10. II W	11. 4 (four)	11a.
	12. Country of origin* NA / Permit No. 0051803 / Date 20/01/17	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
*** For Pre-Convention specimens

13. THIS PERMIT / CERTIFICATE IS ISSUED BY J T SHOLOGAN

PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
19 DEC 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

3899915

Pretoria
Place

19/12/20
Date

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	
B	
C	
D	

15. Bill of Lading/Air Waybill Number:

Port of Export | Date | Signature | Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621)

PERMIT / CERTIFICATE Nº 205848

INTEGRATED PERMIT No.: 205848

This is an integrated permit for species listed in the CITES- and Threatened or Protected Species Regulations under the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004).

Signature

Date:

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
19 DEC 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

PERMIT CONDITIONS FOR THE NATIONAL/ INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NON-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH

These conditions will be applicable to all National/ International Imports, Exports and Re-Exports of CITES and Non-CITES species and any products thereof; live wild animals, live exotic animals, hunting trophies, wild animal products, protected plants and live fish by air, mail, rail and road within the Gauteng Province of which the first port of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

Import permits are not valid unless the imported consignment is accompanied by a valid ***(original)*** export permit from the country/ province of origin ***(if required)***, which must be handed to the authorized Environmental Management Inspector on inspection.

THE FOLLOWING CONDITIONS ARE APPLICABLE TO:

(A) ALL NATIONAL/ INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR, MAIL, RAIL, ROAD)

THIS PERMIT:

1. a) Shall not be transferable;
   b) Shall be invalid until the signature of the holder/ Recipient thereof been appended thereto;
   c) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspector/ official prior to the import, export or re-export taking place. In cases of importation of live animals, which are to be quarantined at OR Tambo International Airport's Quarantine Station, the permit must be released prior to the animals leaving quarantine. Original import permits to be inserted into a sealed envelope and placed in the Environmental Management Inspector box that's provided at the quarantine station, no more than 14 working days after import;
   d) Shall be subject to the provisions of any other law and or regulation;
   e) Shall be valid for one consignment only;
   f) This permit is subject to the compliance of Veterinary and Agricultural requirements; and to the compliance of IATA Live Animal Regulations.

2. The permit holder or his delegated agent must contact one of the authorized Environmental Management Inspector/ officials, per telephone ***and*** confirm per fax a minimum of ***48 hours*** prior to the import, export or re-export taking place to book an inspection (the inspection booking must be requested a minimum of 48 hours prior to the intended inspection), applicable for shipments done over weekends and public holidays, with the following information:
   a) Name / Company Name of Importer / Exporter;
   b) Name of Airline and Warehouse where intended inspection will take place;
   c) Date and Time of Import / Export / Re-Export;
   d) Date and Time of intended inspection (subject to approval);
   e) Agents particulars (if applicable), Carrier Name, Flight Number, Flight Time and Waybill Number;
   f) The applicable permit number/s and relevant expiry dates; and
   g) Detailed packing list as per condition 6.

3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspector/ official may be contacted at the following telephone numbers during office hours ***(07:00 – 15:30)***:
   Office: **+27 (11) 390-3687/ 2311**
   Fax: **+27 (11) 390-1720**

4. All relevant documentation, including ***original*** permit/s ***(CITES permits must include original and coloured copy)***, Packing List/s. A photo copy of all these documents must also be handed to the Environmental Management Inspector/ official on inspection. The original permit/s, these conditions and packing list/s must accompany the consignment/s.

5. All transport containers must be numbered and the numbers must coincide with the numbers on the packing list/s. The country/ province of destination as shown on the containers must coincide with the country/ province of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s.

6. Detailed packing list/s, that are signed and dated must accompany the consignment/s, with the following information:
   a) Details of Importer and Exporter (Names, addresses and contact numbers);
   b) Waybill number/s and name of carrier, flight number, date and time;
   c) Transport container number/s;
   d) Scientific name of species (in full) with relevant transponder / tag / ring numbers; a detailed description of specimen / product and the origin thereof;
   e) Common name of species (in full);
   f) Number per species per container (actual number exported / imported); and
   g) Applicable permit number/s

7. If this permit is not used, the ***original permit (CITES permits must include coloured copy)*** must be returned to the issuing authority within ***14 working*** days after expiry thereof. Import permits must be returned to the issuing authority within ***14 working days*** after use. Export permits must be handed to a Management Authority of the importing country/ province within ***14 working days*** after use.

8. The permit holder must make and retain photo copies of permit/s for audit inspections. Copies of import permits must be made and retained ***after endorsement***, for Re-export permit applications. When applying for a Re-export permit, a copy of the ***endorsed import permit*** must be submitted to the Permit office with the application.

9. A person authorized thereto by the Premier may only make any alteration on the permit.

10. Failure to comply with any of the permit conditions renders the permit invalid and may result in criminal proceedings, cancellation of the permit/s and seizure of the consignment/s.

11. The holder of the permit and / or his/ her delegated agent will be held responsible for any legal costs; costs incurred for delays and / or storage fees due to irregularities and / or due to the consignment being late in the inspection booth/ location, 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/ [illegible] cancelled, or if they are to be late for an inspection within a reasonable time before the inspection is due to take place.

DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
19 DEC 2017
DIRECTORATE: CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

Signature of Issuing Officer — Full Name: O J TSHABALALA

(b) (6)

Signature of Recipient — Full Name: LISA FERREIRA

Date: 2017/12/21

Conditions to this permit have been issued subject to the provisions of section 100 (2), Ordinance 12 of 1983; the National Environmental Management: Biodiversity Act, 2004; the Threatened or Protected Species Regulations, 2007 and the Convention on International Trade In Endangered Species Regulations, 2010.

PERMIT / CERTIFICATE № 205102

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

☐ EXPORT
☒ RE-EXPORT
☐ IMPORT
☐ OTHER

ORIGINAL

2. Valid until 19/06/2018

3. Importer (name and address) [redacted]
(b) (6)
Mapleton Utah 84664 USA

3a. Country of import USA

4. Exporter / Re-exporter (name, address and country)
Highveld Taxidermists (Pty) Ltd
354 Vlakplaats, Hennopsrivier
Erasmia
0023 PRETORIA ZA

5. Special conditions ZA 168504 dd 23/02/2017
Invalid without attached permit conditions page 2 of 2) Integrated permit doc attached

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) H

5b. Security stamp No. 1369919

	7.a 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	Carved bone	10. II W	11. 1 (one)	11a.
	12. Country of origin* NA	Permit No. 0051803	Date 20/01/17	12a. Country of last re-export	Certificate No.
	Date	12b. No. of the operation ** or date of acquisition ***			
B	(Loxodonta africana) African elephant	Tail wall hanging	10. II W	11. 1 (one)	11a.
	12. Country of origin* NA	Permit No. 0051803	Date 20/01/17	12a. Country of last re-export	Certificate No.
	Date	12b. No. of the operation ** or date of acquisition ***			
C	(Loxodonta africana) African elephant	Hair bracelets (jewellery)	10. II W	11. 5 (five)	11a.
	12. Country of origin* NA	Permit No. 0051803	Date 20/01/17	12a. Country of last re-export	Certificate No.
	Date	12b. No. of the operation ** or date of acquisition ***			
D	(Loxodonta africana) African elephant	Leather gunbag	10. II W	11. 1 (one)	11a.
	12. Country of origin* NA	Permit No. 0051803	Date 20/01/17	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
*** For Pre-Convention specimens

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
20 DEC 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

13. THIS PERMIT / CERTIFICATE IS ISSUED BY:
LA Lotter
Pretoria — Place
20/12/2017 — Date
Security stamp, signature and official seal

14. EXPORT ENDORSEMENT

Block	Quantity
A	
B	
C	
D	

15. Bill of Lading/Air Waybill Number:

Port of Export | Date | Signature | Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621)

PERMIT / CERTIFICATE № 205102

CONDITIONS FOR PERMIT NO. 20 5102

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

hese 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 nimals, 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 ort of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

mport 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 ust be handed to the authorized Environmental Management Inspector on inspection.

HE FOLLOWING CONDITIONS ARE 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 (INCLUDING AIR, MAIL, RAIL, ROAD)

IS 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.

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.

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 – 16:00)***:

Office: +27 (11) 380-3687/ 2311
Fax: +27 (11) 380-1720

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.

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.

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

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.

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.

Only A person authorized thereto by the Premier or Minister may make any alteration on the permit.

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.

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.

Permit holders or their delegated agents must contact the Environmental Management Inspector/ official if an inspection is cancelled, or if they are to be late for an inspection within a reasonable time before the inspection is due to take place.

GAUTENG PROVINCIAL GOVERNMENT
AND ACTIVITY MANAGEMENT
20 DEC 2017
DIRECTORATE: BIODIVERSITY CONSERVATION
PERMITS OFFICE
P.O. BOX 8769 JOHANNESBURG 2000

Signature of issuing Officer
Date
Full Name

(b) (6)

Date
Full Name

Additions to this permit are subject to the provisions of Convention on International Trade in Endangered Species of wild fauna and flora (CITES) regulation 3(2)(a) & (5)(a) of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004).

PERMIT NO.: 205102

This is an integrated permit for species listed in the CITES- and Threatened or Protected species Regulations under the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004).

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
20 DEC 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

MAY 15 2018

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

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

Federal Fish and Wildlife Permit Application Form

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

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Schumacher	Randolph	Paul	

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

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

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Colorado Springs	CO	80906		USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification–I hereby certify that I have read and am familiar with the regulations contained in *Title 50, Part 13 of the Code of Federal Regulations* and the other *applicable parts in subchapter B of Chapter I of Title 50*, and I certify that the information submitted in this application for a permit is complete and accurate to the
(b) (6)
t 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): 04/26/2018

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 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] Date: 4/26/2018

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):
Randy Schumacher, (b) (6) [redacted]

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

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

Professional Cargo Services Inc.

15619 Morales Rd., Houston, Texas 77032 281-220-3158

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.
U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS #: (b) (6)
Cell Phone #:
Email Address: (b) (6)

X Individual

KNOW ALL MEN BY THESE PRESENTS: That RANDOLPH (RANDY) Schumacher (Full Name of Person), residing at (b) (6) COLORADO SPRINGS, CO 80906

hereby constitutes and appoints each of the following persons, **Professional Cargo Services 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, steed 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 cosigned 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 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 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 two 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 Professional Cargo Services Inc. duties and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

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. The amendments are effective as of September 27, 1982.

(Print Name) RANDOLPH Schumacher by John Rulon CHB ATTY IN FACT has caused these presents to be sealed and signed:

Signature (b) (6)

Date: 3/20/2020

Ministry of Environment and Tourism

DIRECTORATE OF WILDLIFE AND NATIONAL PARKS

AERIAL SURVEY OF NORTH-EASTERN NAMIBIA –

ELEPHANTS & OTHER WILDLIFE IN ZAMBEZI REGION

SEPTEMBER/OCTOBER 2019

G.C. Craig & D. St.C. Gibson

DG Ecological Consulting

The 2019 aerial survey of wildlife in Zambezi Region, Namibia was commissioned by KfW on behalf of the Ministry of Environment and Tourism (MET), Government of Namibia as part of the survey of elephants in north-eastern Namibia.

Funding: Funding for the aerial survey was provided by KfW

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Disclaimer: Opinions expressed in this publication do not necessarily reflect those of the Ministry of Environment & Tourism. All technical queries should be addressed to the authors.

Photo: Elephants from the air in Namibia – M. Brassine

AERIAL SURVEY OF NORTH-EAST NAMIBIA – ELEPHANTS & OTHER WILDLIFE IN ZAMBEZI REGION, SEPTEMBER/OCTOBER 2019

SUMMARY

An aerial survey of wildlife and domestic livestock took place in Zambezi Region from 25th September to 4th October 2019 as part of a wider survey including Khaudum National Park and its neighbouring conservancies . A total area of 17 380km^2 was sampled at intensities between 10 and 40%.

The estimates of numbers of each species are tabulated below. The estimated number of elephants is lower than that from the 2015 survey, but the change is not statistically significant. There were considerably fewer elephant carcasses seen in 2019. However as a result of the policy of MET to remove carcasses from the field, mortality can no longer be estimated from the aerial survey results. Illegal hunting of elephants continues to take place in the area.

SPECIES	Population estimate	95% Confidence Range		
All Elephants	12008	9410	-	14606
Elephant Family	10862	8283	-	13440
Elephant Bull	1146	849	-	1443
Elephant Carcass 1	5	1	-	13
Elephant Carcass 2	26	5	-	50
Elephant Carcass 3	141	79	-	202
Elephant Carcass 4	347	251	-	443
All Elephant carcasses	519	398	-	640
Baboon	189	58	-	319
Buffalo	7538	3844	-	11231
Duiker	311	197	-	424
Eland	431	167	-	694
Giraffe	403	204	-	602
Hippopotamus	2435	1464	-	3406
Impala	3486	2175	-	4798
Kudu	995	686	-	1305
Lechwe	4931	3168	-	6694
Monkey	36	14	-	69
Reedbuck	275	128	-	421
Roan	325	172	-	477
Sable	2137	1470	-	2803
Steenbok	65	23	-	107
Tsessebe	108	23	-	217
Warthog	1135	742	-	1529
Waterbuck	171	60	-	283
Wildebeest	1483	449	-	2545
Zebra	10767	6501	-	15032
Crocodile	403	277	-	528
GroundHornbill	31	4	-	84
Ostrich	90	22	-	159
Cattle	135878	119628	-	152127
Sheep/goats	6838	4862	-	8815

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AERIAL SURVEY OF NORTH-EAST NAMIBIA – ELEPHANTS & OTHER WILDLIFE IN ZAMBEZI REGION, SEPTEMBER/OCTOBER 2019

1. INTRODUCTION

The 2019 aerial survey of elephants and other species in Zambezi Region was conducted between 25 September and 6 October 2019. Records included not only elephants and elephant carcasses, but also other species of wild animals, domestic livestock and human activities.

The survey was conducted according to the internationally accepted MIKE standard practices (Craig 2012) in a light aircraft (a Cessna 182) using stratified systematic transect sampling (Norton Griffiths, 1978). Detailed descriptions of methods are provided in Appendix I.

To facilitate comparisons with previous surveys, basic stratification of the survey area (Fig. 1) was the same as for previous surveys (Craig & Gibson 2013; Gibson & Craig 2015). These were designed to maximise precision and do not follow the boundaries of protected areas and conservancies (Fig. 2).

The Rooikat Trust, a Namibian conservation NGO, that has a special interest in wildlife in eastern Zambezi Region supported additional survey effort with the aim of improving the precision of estimates in the area. To do this, "super-strata" were overlaid on east Zambezi strata to provide higher sampling intensities than in previous surveys (Fig. 1). The results were combined with the data from the "original" strata to provide overall estimates.

Table 1. Survey strata

	Stratum Name	Stratum code	Area km²
1	Bwabwata	BAB	3 789
2	Buffalo/Mahango A	BUFA	1 162
3	Buffalo/Mahango B	BUFB	"
4	Buffalo/Mahango C	BUFC	"
5	E Zambezi North	EZN	4 772
6	E Zambezi South	EZS	3 099
7	Kwando A	KWA	1 513
8	Kwando B	KWB	"
9	Kwando N	KN	666
10	Salambala/Impalila A	SALA	1 245
11	Salambala/Impalila B	SALB	"
12	Susuwe A	SUSA	1 134
13	Susuwe B	SUSB	"
14	Susuwe C	SUSC	"
15	Rooikat N A	RNA	(774)
16	Rooikat N B	RNB	(774)
17	Rooikat S A	RSA	(1 959)
18	Rooikat S B	RSB	(1 959)
	Overall		**17 380**

The survey strata are listed in Table 1.

Those numbered 1 to 14 are the same as previous surveys, while the "Rooikat" strata, numbers 15 to 18 are the overlaid super-strata.

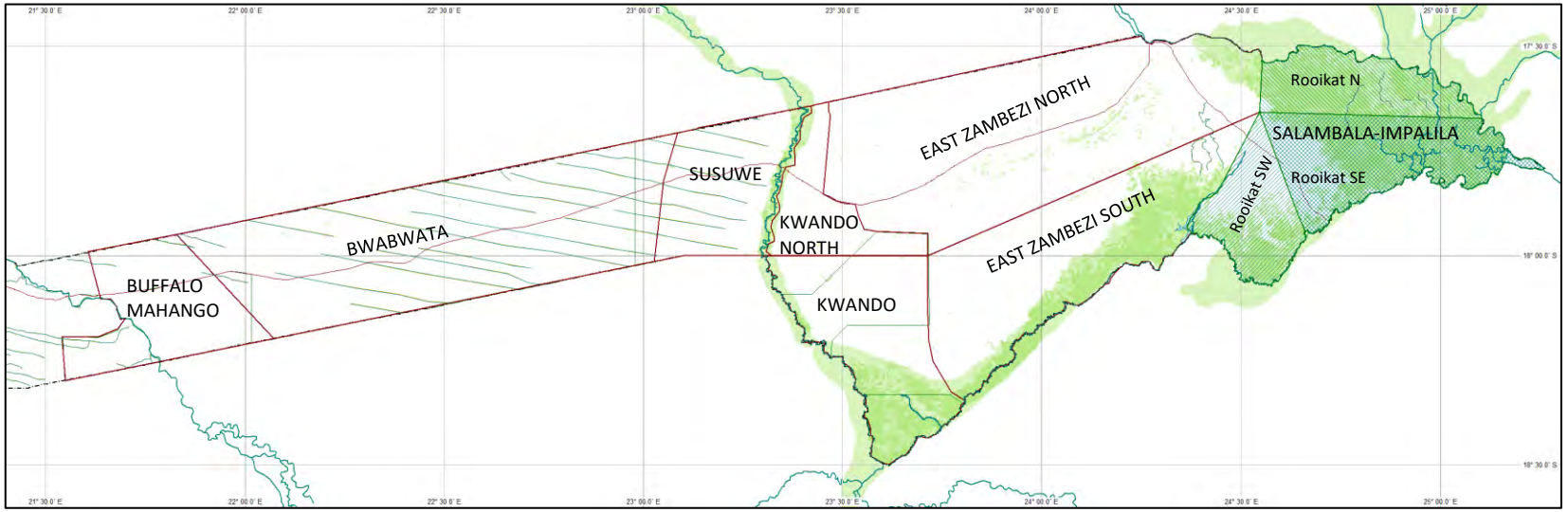

Figure 2 2019 strata (additional strata in lower case)

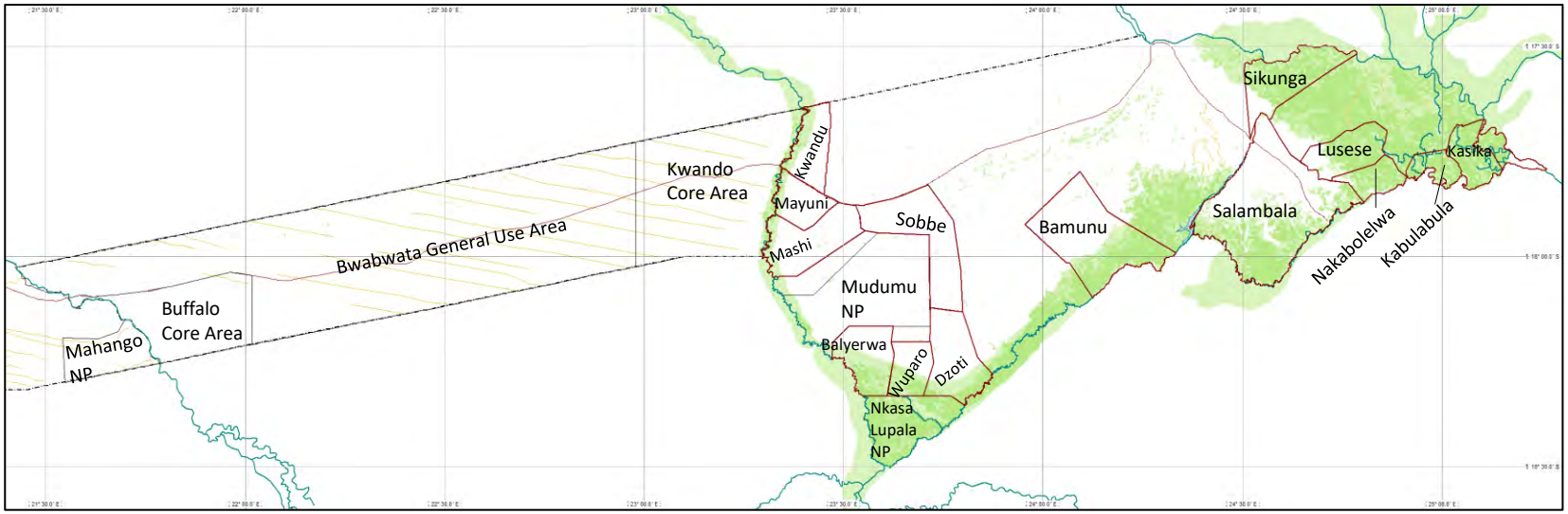

Figure 1 Boundaries of protected areas and conservancies

2. RESULTS AND COMMENTS

2.1. Reporting format

This report follows the format used for previous surveys of wildlife in Namibia. For each species, a table provides the estimated number per stratum with its 95% confidence range. This "range" refers to the range within which there is a 95% probability that the true number falls (i.e. it is the 95% confidence interval). Strictly, for most species this is actually the range within which 95% of independent *estimates* made by the same method would fall. The true value is likely to be higher on average because of undercounting bias.

The numbers actually seen by the observers are also provided. "No. in" is the number of animals seen within sampling strips and "No. out" is the number seen outside of the sampling strips. Where animals were seen only outside of the sampling strips no estimate can be given but the information can be used to show that the species occurs and where it occurred.

Wildlife species in this section are arranged in alphabetical order of their common names with the exception of Elephant and buffalo, which are placed first and second respectively, which are put together after zebra. At the end of the wildlife section, the carcasses of species other than elephant are reported.

Full results per stratum are given in Appendix II.

2.2. Observations of Wildlife

2.2.1. Elephant numbers

Table 2. Estimates of Elephants in Family Groups

	Pop. Est.	No. in	No. out	PrP%	95% Range	No./100 km²
Buffalo / Mahango	3546	1107	1562	43.8	1992 - 5100	305.16
Bwabwata	95	10	14	197.1	10 - 283	2.52
Susuwe	2336	617	822	58.4	972 - 3701	206.04
Kwando North	0					
Kwando	3093	618	656	43.1	1739 - 4446	204.4
East Zambezi North	0					
East Zambesi South	1315	169	241	72.5	362 - 2267	42.42
Salambala	477	198	181	91.4	198 - 912	38.29
Overall	**10862**	**2719**	**3476**	**23.7**	**8283 - 13440**	**62.5**

Table 3. Estimates of Elephant Bulls

	Pop. Est.	No. in	No. out	PrP%	95% Range	No./100 km²
Buffalo / Mahango	540	168	202	45.0	297 - 783	46.44
Bwabwata	0	0	6	0	0 - 0	0
Susuwe	186	67	78	61.8	71 - 301	16.39
Kwando North	0					
Kwando	362	75	113	41.5	209 - 514	23.92
East Zambezi North	0					
East Zambesi South	29	3	1	137.3	3 - 68	0.92
Salambala	30	13	6	76.4	13 - 53	2.43
Overall	**1146**	**326**	**406**	**25.9**	**849 - 1443**	**6.59**

Table 4. Estimates of All Elephants

	Pop. Est.	No. in	No. out	PrP%	95% Range	No./100 km²
Buffalo / Mahango	4086	1275	1764	37.5	2552 5619	351.6
Bwabwata	95	10	20	197.1	10 283	2.52
Susuwe	2522	684	900	55.2	1130 3915	222.43
Kwando North	0					
Kwando	3455	693	769	39.5	2072 4838	228.32
East Zambezi North	0					
East Zambesi South	1343	172	242	71.4	385 2302	43.34
Salambala	507	211	187	86.6	211 946	40.71
Overall	**12008**	**3045**	**3882**	**21.6**	**9410 - 14606**	**69.09**

2.2.2. Elephant distribution

In the Zambezi survey area, elephants were found mainly in protected areas (Figs 3 & 4). This was the case in previous surveys which were also conducted in the dry season. There are no survey data to show wet season distributions, but the combined evidence from carcasses (Fig 5) suggests that elephants are more widespread than shown by dry season surveys and are found in areas that have no water during the dry season. Distributions of elephants were very similar to those in 2014 (see Figs 6 and 7). This is clearly typical of distribution during dry seasons.

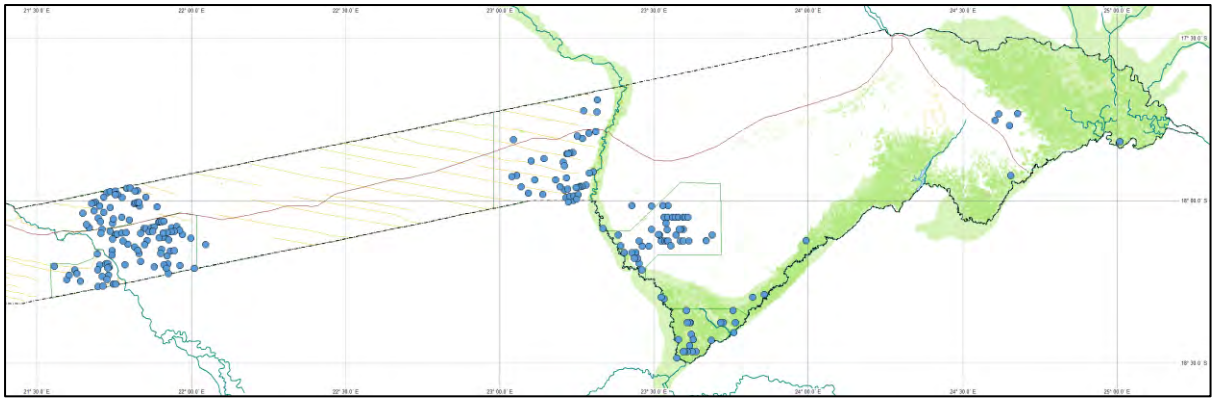

Figure 3 Sightings of elephants in bull groups 2019

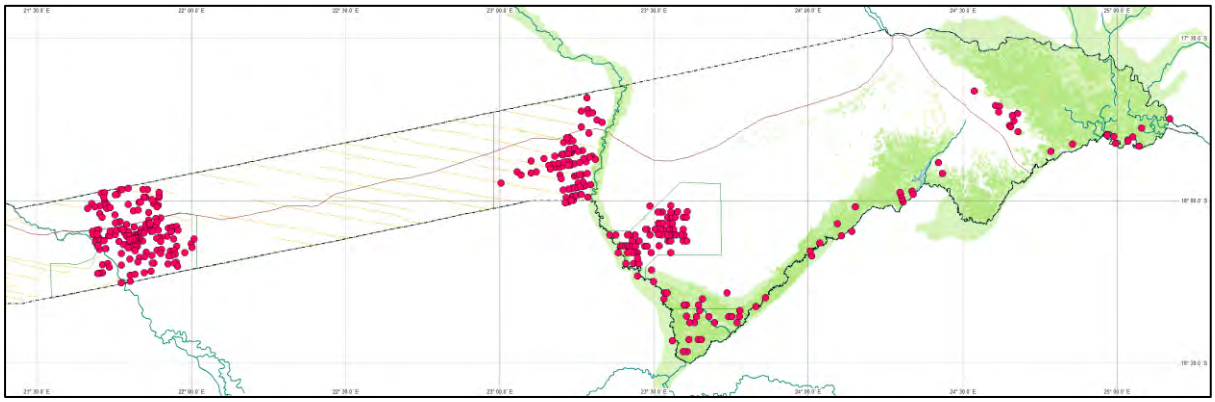

Figure 4 Sightings of elephants in family groups 2019

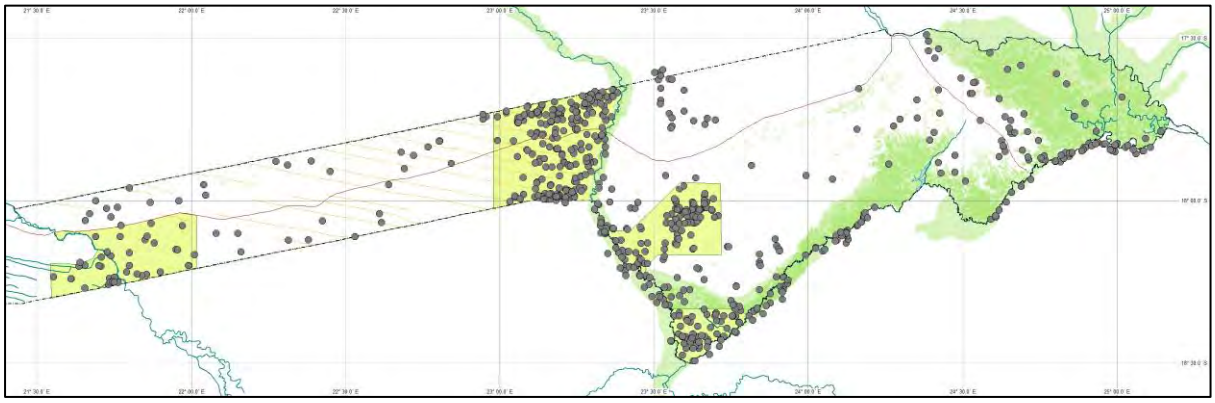

Figure 5 Sightings of elephant carcasses 2013 - 2019

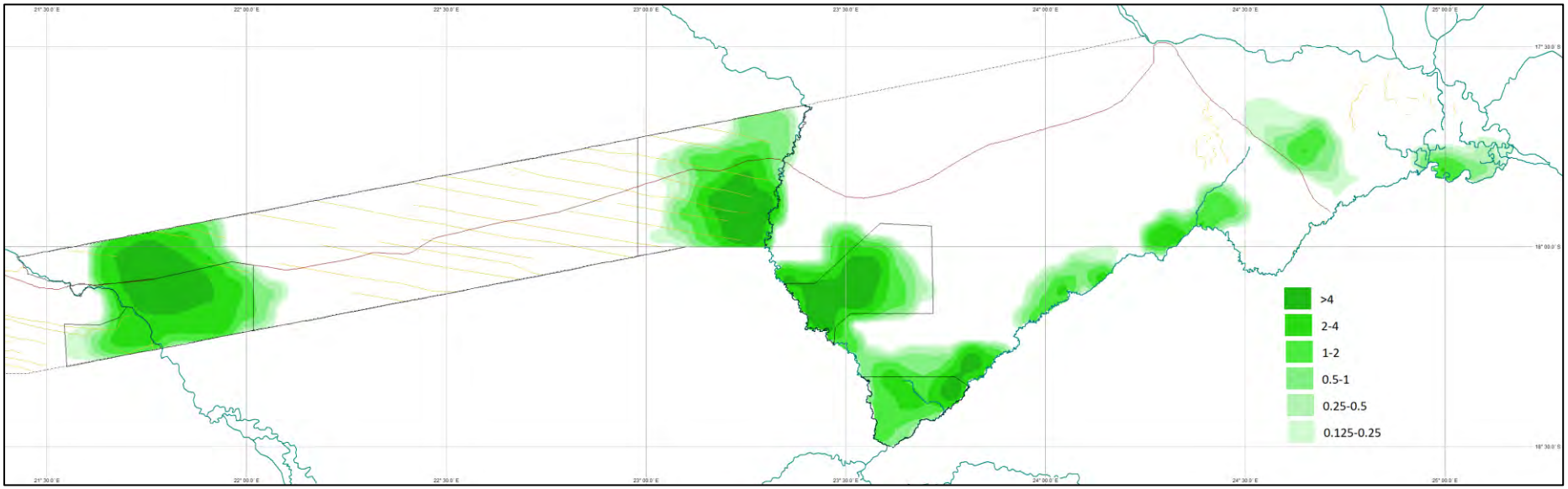

Figure 6 Density distribution of elephants in Zambezi Region 2019

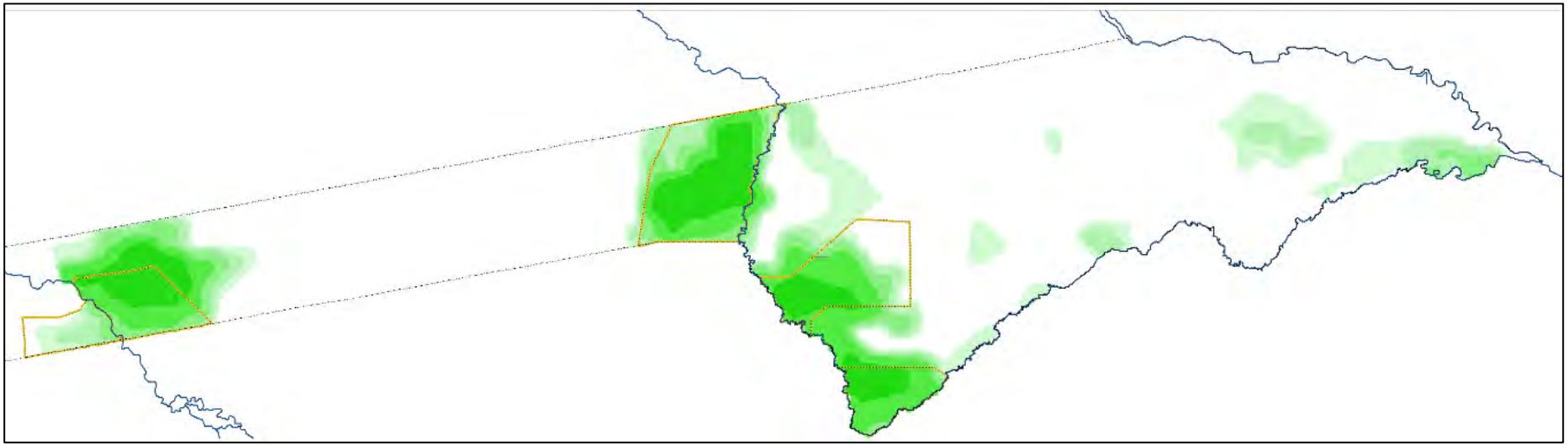

Figure 7 Density distribution of elephants in Zambezi Region 2015

2.2.3. Elephant population trends

As reported previously (Craig & Gibson 2013, Craig & Gibson 2014, Gibson & Craig 2015), estimates from previous surveys are difficult to compare because of differences in overall areas surveyed and differences in the methods used. Survey methods from 1994 onwards were broadly similar apart from total counts of wetlands. Table 5 provides information from surveys between 1994 and 2019.

Table 5. Results of aerial surveys of elephants in Zambezi Region (Caprivi) since 1994

Year	Estimate/ no counted	95% CL as % of Est.	95% range			Survey type	Source of Information
			low		high		
1994	7950	59.00	3255	-	12645	Sample	ULG 1994
1994	5556	0.00		-		Total	Rodwell *et al.* 1995
1995	4883	25.56	3635	-	6130	Sample	Lindeque *et al. 1995*
1998	4576	27.30	3328	-	5824	Sample	MET 1999
2004	8725	28.28	6258	-	14983	Sample	Kolberg 2004
2004	860	0.00		-		Total	Stander *et al. 2004*
2005	6474	37.77	4035	-	8912	Sample	Chase & Griffin 2006
2007	3062	0.00		-		Total	Chase 2007
2007	11339	*10.18	*10185	-	*12493	Sample + total**	Chase 2008
2009	3450	0.00		-		Total	Chase 2009
2011	10847	32.70	7300	-	14394	Sample	Craig 2011
2013	9165	21.46	7198	-	11132	Sample	Craig & Gibson 2013
2014	14097	18.7	11462	-	16732	Sample	Craig & Gibson 2014
2015	13136	26.1	9701	-	16570	Sample	Gibson & Craig 2015
2019	12008	21.6	9410	-	14606	Sample	This report

***** *the 95% confidence limits provided above have been calculated independently. Statistics presented in Chase 2008 are incorrect*

*** *a sample survey except for Mamili NP surveyed as a total count*

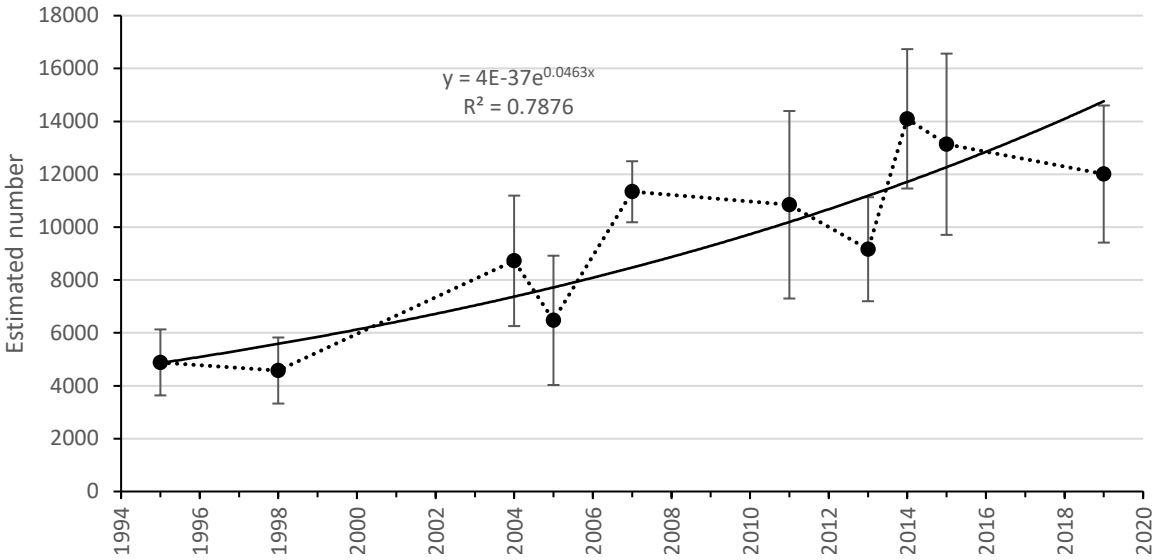

Figure 8 Population trend of elephants in Zambezi region
(note: estimates from 1994 surveys were omitted because the survey area was different. Total counts conducted in 2004, 2007 and 2009 were also omitted as they are not considered comparable with the sample counts.)

The overall rate of change from 1998 averages an increase of 4.74% (2.74% - 6.82%) and is statistically significant (F=29.7, p = 0.0006***) (Fig. 8).

Estimates have decreased over the past 3 surveys, but the decline is not significant. It is possible that such a decrease is real: some decline might be expected as a result of the illegal hunting that took place from before 2013 (Craig & Gibson 2013) but this is not shown by the available population data. Additional evidence on the level of illegal hunting might be provided by the data from carcass estimates (see below).

2.2.4. Elephants – carcass numbers

Table 6 gives estimates of numbers of elephant carcasses in the four decay stages (Douglas-Hamilton & Burril 1991) which are described in Appendix Ic. Change in carcass numbers and carcass ratios can be more sensitive indicators of excess mortality than change in population size (Craig & Gibson 2013). However, the policy of removing carcasses from the field renders the carcass ratio invalid as an index of population status.

Comparing numbers in the light of numbers removed is another option. That is, there were an estimated 733 carcasses within protected areas (Bwabwata, Mahango, Mudumu and Nkasa Rupara National Parks) in 2015. Since then, 400 carcasses have been removed from these areas (Fig. 10). The present estimate in the areas is 343. One interpretation would be that the present number represents those of the 733 original carcasses that were not picked up, there having been very little mortality since 2015. Conversely all the 2015 carcasses may have been collected or deteriorated beyond recognition, so that the 343 present carcasses have all accumulated since 2017. One thing that may be said with confidence is that 94 carcasses (of stages 1, 2 or 3) have accumulated in the area in the last two years, which suggests poaching is continuing, albeit at a reduced rate.

In the areas where carcasses were not removed (see Fig. 10), the number of carcasses estimated has declined from 450 in 2015 to 175 in 2019, a highly significant difference (t=3, p<0.003***). Here the rate of accumulation from mortality has been outweighed by deterioration of the carcasses already present because here, at least, poaching has declined although the carcass ratio is still 9%, which is marginal for sustainability.

Maps of sightings of carcasses seen during successive surveys (Fig. 9) suggest that there were high levels of elephant poaching from 2013 to 2015 that have declined by 2019. The map (Fig.10) of carcasses that were removed in 2017 and 2019 show a substantial number of carcasses and the areas where removal took place.

Table 6 gives estimates of numbers of elephant carcasses in the four decay stages which are described in Appendix Ic.

Table 6. Estimates of Elephant Carcasses

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km²
Carcass 1						
Kwando	5	1	0	188.2	1 - 14	0.31
Carcass 1 Overall	**5**	**1**	**0**	**182.4**	**1 - 13**	**0.03**
Carcass 2:						
Buffalo / Mahango	6	2	0	135.8	2 - 15	0.54
Kwando	10	2	0	128.7	2 - 24	0.68
East Zambezi South	10	1	0	188.8	1 - 27	0.31
Salambala	0	0	1	0	0 - 0	0
Carcass 2 Overall	**26**	**5**	**1**	**89.6**	**5 - 50**	**0.15**
Carcass 3:						
Buffalo / Mahango	13	4	0	86.4	4 - 24	1.13
Bwabwata	10	1	1	192.1	1 - 28	0.25
Susuwe	17	4	0	117.7	4 - 37	1.5
Kwando	33	7	0	93.8	7 - 65	2.21
East Zambezi North	38	4	0	91.8	4 - 73	0.8
East Zambesi South	22	3	0	116.5	3 - 48	0.72
Salambala	7	3	0	186.5	3 - 21	0.58
Carcass 3 Overall	**141**	**26**	**1**	**43.5**	**79 - 202**	**0.81**
Carcass 4:						
Buffalo / Mahango	13	4	0	83.4	4 - 24	1.15
Bwabwata	67	7	1	64.4	24 - 110	1.76
Susuwe	74	25	0	41.2	44 - 105	6.53
Kwando	95	19	2	51.5	45 - 145	6.28
East Zambezi North	22	3	0	117.8	3 - 48	0.46
East Zambesi South	57	8	0	103.5	8 - 116	1.85
Salambala	19	8	0	73.4	8 - 32	1.5
Carcass 4 Overall	**347**	**74**	**3**	**27.6**	**251 - 443**	**2**
All Carcasses :						
Buffalo / Mahango	33	10	0	47.8	17 - 48	2.82
Bwabwata	76	8	2	58.7	31 - 121	2.01
Susuwe	91	29	0	37.4	57 - 125	8.04
Kwando	143	29	2	37.5	89 - 198	9.48
East Zambezi North	60	7	0	82.5	11 - 110	1.26
East Zambesi South	89	12	0	88.4	12 - 168	2.87
Salambala	26	11	1	73.0	11 - 45	2.08
Carcasses Overall	**519**	**106**	**5**	**23.4**	**398 - 640**	**2.98**

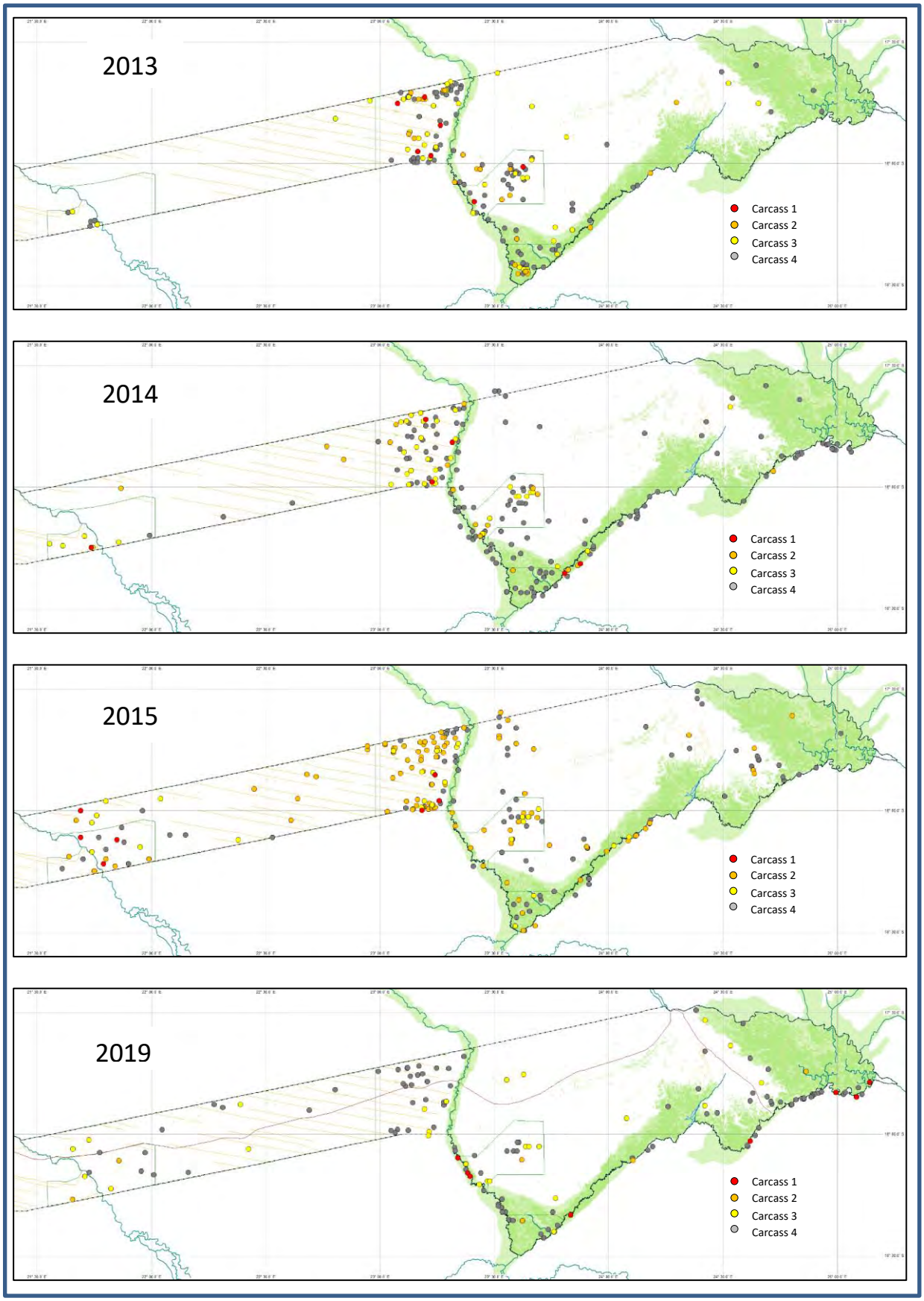

Figure 9 Sightings of carcasses during aerial surveys 2013 to 2019

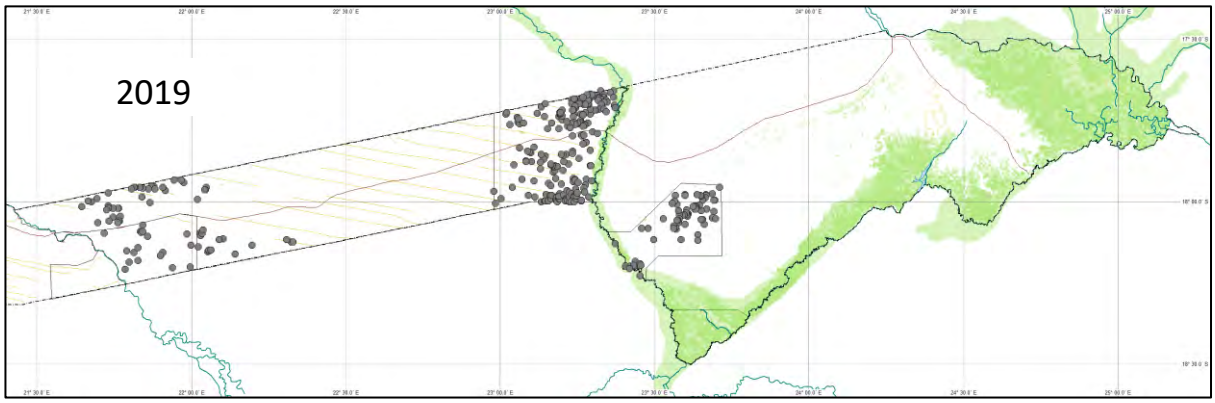

Figure 10 Carcasses removed from the field in 2017 and 2019

During positioning turns over Botswana between transects, the survey recorded a total of 68 carcasses, 9 of which were killed recently. Several of these were fresh, none had tusks and some had fallen together. The number is greater than seen in 2014 (53) and is evidence of a continuing poaching problem just across the border.

2.2.5. Elephants – herd sizes

Elephants that are under pressure tend to group into large herds and comparisons of herd sizes in 2014 and 2015 showed significantly increased herd sizes in Kwando and Susuwe (Table 7) (Gibson & Craig 2015). This trend appeared subsequently to be reversed and mean herd sizes in those strata decreased significantly (Table 8).

Table 7. Comparison of mean herd sizes 2014 - 2015

STRATUM	Mean herd size		t	p	df
	2014	2015			
Bwabwata	21	10	2.1331	0.0769	6
Buffalo/Mahango	16	11	3.5183	0.0005***	225
East Zambezi S	15	34	1.8049	0.0862	20
Kwando	13	19	2.9245	0.0036**	446
Kwando N	13	17	0.9091	0.4049	5
Salambala	20	13	1.2254	0.2294	32
Susuwe	14	25	3.3077	0.0011**	292
Overall Zambezi Region	14	18	1.4205	0.1558	1041

Table 8. Comparison of mean herd sizes 2015 - 2019

STRATUM	Mean herd size		t	p	df
	2015	2019			
Bwabwata	10	8	1.4569	0.1731	11
Buffalo/Mahango	11	13	1.5680	0.1178	328
East Zambezi S	34	17	1.7633	0.0863	36
Kwando	19	9	4.9373	1.1798E-	387
Kwando N	17	0			
Salambala	13	13	0	1	37
Susuwe	25	12	3.3758	0.000821***	340
Overall Zambezi Region	18	9	4.9057	1.0645E-	1153

2.2.6. Buffalo

Table 9. Estimate of buffalo numbers

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	3370	1051	943	49.3	1709 - 5030	289.99
Babwata	0					
Susuwe	161	57	25	73.0	57 - 278	14.16
Kwando North	0					
Kwando	1495	301	507	132.1	301 - 3469	98.78
East Zambezi North	0					
East Zambesi South	2119	223	90	128.8	223 - 4849	68.38
Salambala	394	170	1118	135.2	170 - 926	31.62
Overall	**7538**	**1802**	**2683**	**49.0**	**3844 - 11231**	**43.37**

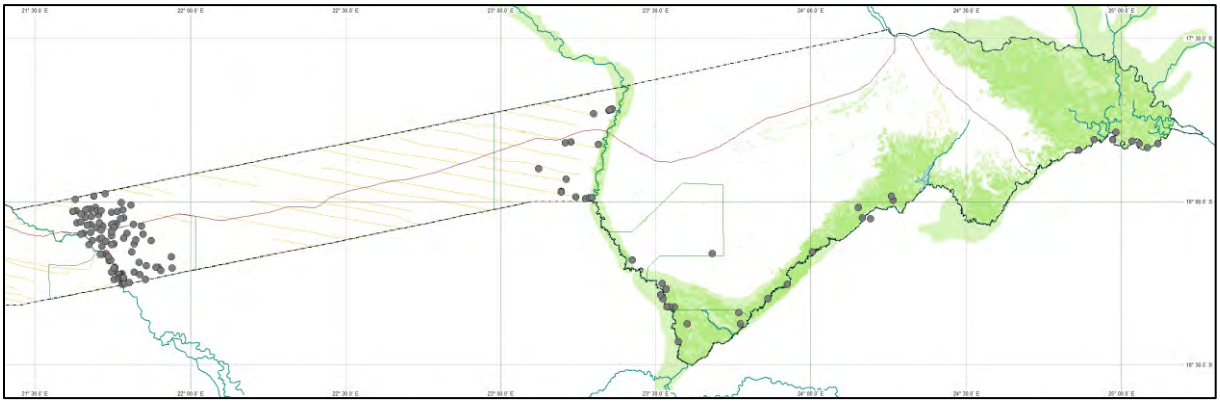

Figure 11 Sightings of buffalo 2019

Table 10. Estimates of buffalo numbers since 2013

	Estimate	PRP%	Source
2013	5339	43.80	Craig & Gibson 2014
2014	4512	46.80	Craig & Gibson 2015
2015	6538	42.50	Gibson & Craig 2015
2019	7538	49.00	This report

2.2.7. Baboon

Table 11. Estimates of Baboon

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	0	0	25		0 - 0	0
Babwata	0					
Susuwe	80	21	0	104.2	21 - 164	7.09
Kwando North	0					
Kwando	108	21	0	99.8	21 - 217	7.17
East Zambezi North	0					
East Zambesi South	0					
Salambala	0					
Overall	**189**	**42**	**25**	**69.2**	**58 - 319**	**1.09**

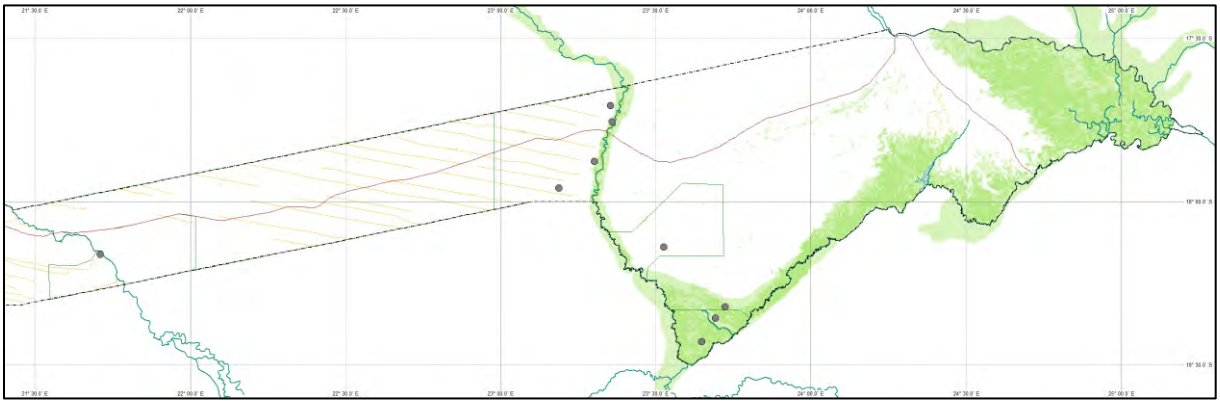

Figure 12 Sightings of baboons 2019

2.2.8. Duiker

Table 12. Estimates of Duiker

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	29	9	0	60.3	11 - 46	2.47
Babwata	153	16	0	66.0	52 - 253	4.03
Susuwe	34	11	0	75.6	11 - 61	3.04
Kwando North	9	1	0	206.2	1 - 27	1.31
Kwando	20	4	0	91.0	4 - 38	1.31
East Zambezi North	38	4	0	87.3	5 - 71	0.8
East Zambesi South	29	3	0	105.8	3 - 59	0.92
Salambala	0					
Overall	**311**	**48**	**0**	**36.5**	**197 - 424**	**1.79**

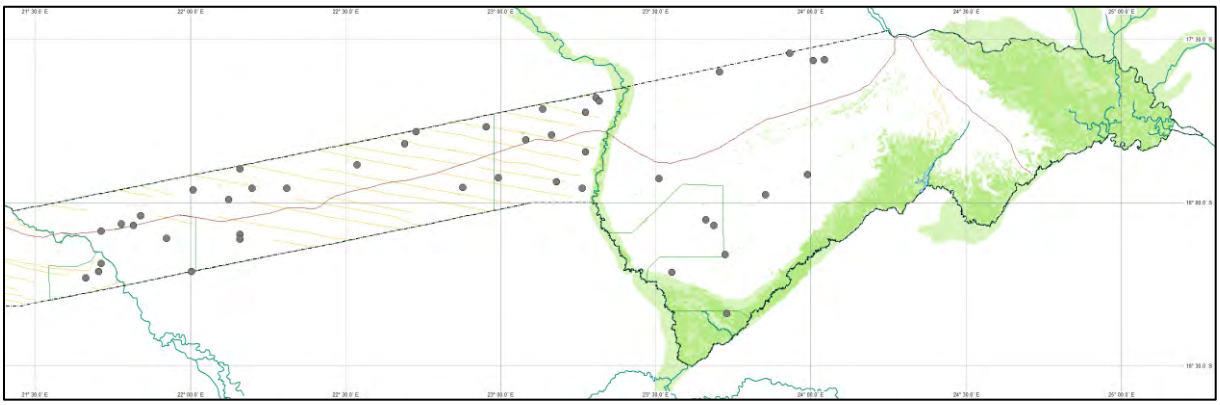

Figure 13 Sightings of duiker 2019

Duiker are difficult to see from the air and estimates are likely to be inaccurate and imprecise. This is apparent from the series of estimates from successive surveys.

Table 13. Estimates of duiker numbers since 2013

	Estimate	PRP%	Source
2013	221	57.60	Craig & Gibson 2014
2014	125	84.90	Craig & Gibson 2015
2015	79	69.70	Gibson & Craig 2015
2019	311	36.50	This report

2.2.9. Eland

Table 104. Estimates of Eland

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	113	36	5	136.3	36 - 266	9.7
Babwata	114	12	0	99.6	12 - 228	3.02
Susuwe	127	33	10	130.1	33 - 292	11.2
Kwando North	0					
Kwando	77	15	0	145.4	15 - 188	5.06
East Zambezi North	0					
East Zambesi South	0					
Salambala	0					
Overall	**431**	**96**	**15**	**61.2**	**167 - 694**	**2.48**

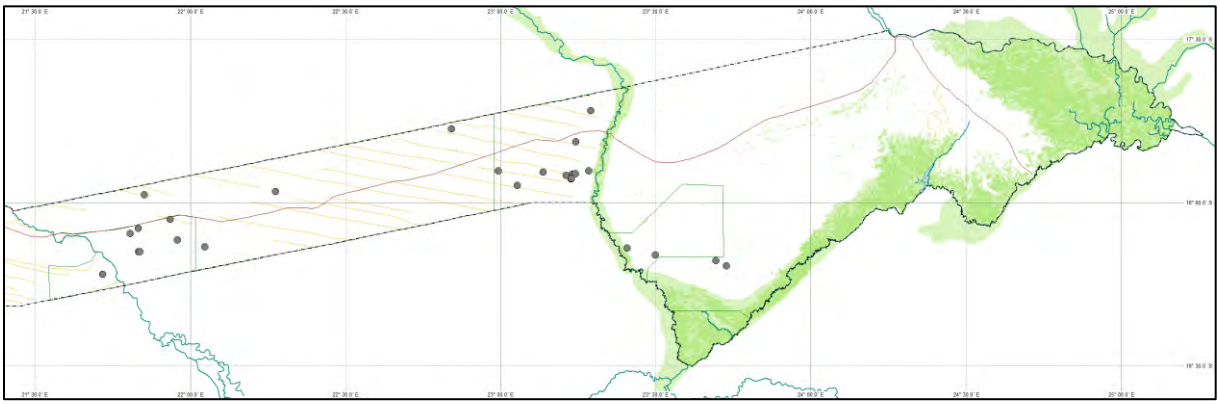

Figure 14 Sightings of eland 2019

Table 15. Estimates of eland numbers since 2013

	Estimate	PRP%	Source
2013	259	108.80	Craig & Gibson 2014
2014	342	137.60	Craig & Gibson 2015
2015	187	118.60	Gibson & Craig 2015
2019	431	61.20	This report

2.2.10. Giraffe

Table 116. Estimates of Giraffe

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	22	7	0	93.3	7 - 43	1.94
Babwata	0	0	4	0	0 - 0	0
Susuwe	250	67	37	75.0	67 - 437	22
Kwando North	17	2	0	146.6	2 - 53	2.61
Kwando	59	12	0	91.5	12 - 113	3.92
East Zambezi North	29	3	0	192.4	3 - 84	0.6
East Zambesi South	26	8	1	106.9	8 - 53	0.83
Salambala	0					
Overall	**403**	**99**	**42**	**49.4**	**204 - 602**	**2.32**

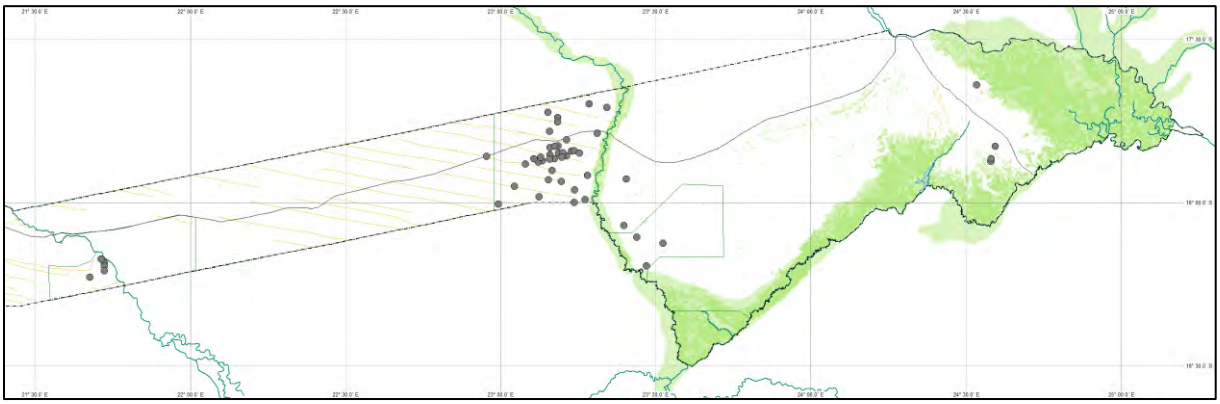

Figure 15 Sightings of giraffe 2019

Table 17. Estimates of giraffe numbers since 2013

	Estimate	PRP%	Source
2013	324	85.30	Craig & Gibson 2014
2014	123	59.50	Craig & Gibson 2015
2015	129	56.30	Gibson & Craig 2015
2019	403	49.40	This report

2.2.11. Hippopotamus

Table 18. Estimates of Hippopotamus

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	205	64	15	67.4	67 - 343	17.65
Babwata	0					
Susuwe	760	237	9	49.3	385 - 1135	67.05
Kwando North	0					
Kwando	1197	241	30	76.6	280 - 2114	79.14
East Zambezi North	127	31	11	107.7	31 - 263	2.65
East Zambesi South	48	15	0	180.4	15 - 135	1.55
Salambala	98	41	0	68.7	41 - 165	7.83
Overall	**2435**	**629**	**65**	**39.9**	**1464 - 3406**	**14.01**

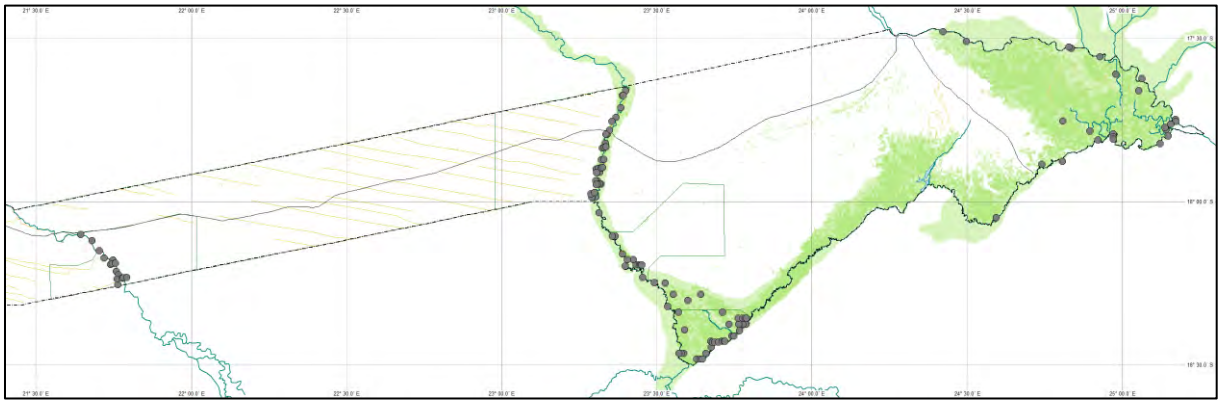

Figure 16 Sightings of hippopotamus 2019

Table 19. Estimates of hippo numbers since 2013

	Estimate	PRP%	Source
2013	3252	25.20	Craig & Gibson 2014
2014	2773	30.30	Craig & Gibson 2015
2015	2692	31.80	Gibson & Craig 2015
2019	2435	39.90	This report

2.2.12. Impala

Table 12. Estimates of Impala

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	157	48	0	114.8	48 - 336	13.48
Babwata	0					
Susuwe	908	277	9	49.1	463 - 1354	80.11
Kwando North	0					
Kwando	2008	406	64	61.8	767 - 3250	132.73
East Zambezi North	3	1	0	185.1	1 - 9	0.07
East Zambesi South	269	84	0	98.0	84 - 533	8.69
Salambala	141	58	80	135.8	58 - 332	11.3
Overall	**3486**	**874**	**153**	**37.6**	**2175 - 4798**	**20.06**

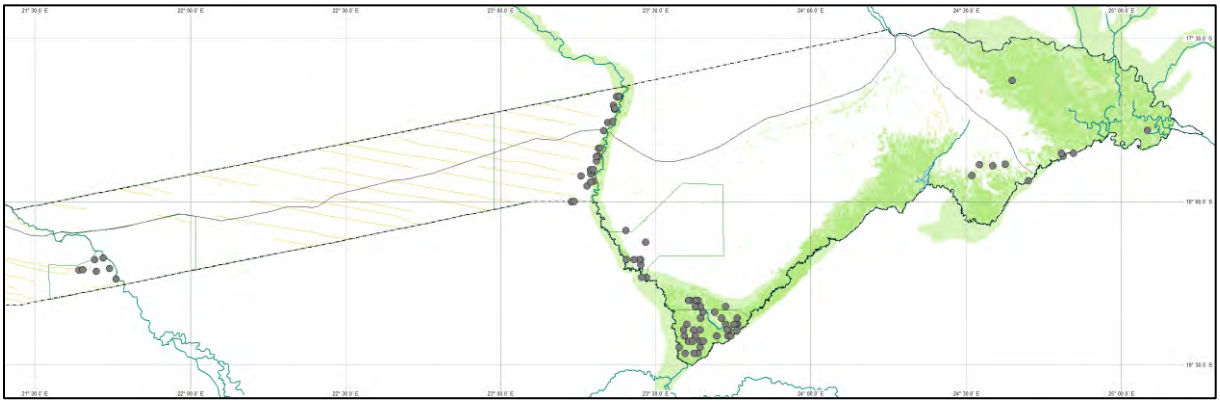

Figure 17 Sightings of impala 2019

Table 21. Estimates of impala numbers since 2013

	Estimate	PRP%	Source
2013	1743	33.00	Craig & Gibson 2014
2014	1616	36.40	Craig & Gibson 2015
2015	2458	48.50	Gibson & Craig 2015
2019	3486	37.60	This report

2.2.13. Kudu

Table 13. Estimates of Kudu

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	392	119	11	46.0	212 - 573	33.75
Babwata	143	15	1	129.8	15 - 329	3.78
Susuwe	200	71	9	52.8	95 - 306	17.67
Kwando North	0					
Kwando	224	45	0	70.9	65 - 383	14.82
East Zambezi North	0					
East Zambesi South	36	11	0	92.1	11 - 68	1.15
Salambala	0					
Overall	**995**	**261**	**21**	**31.1**	**686 - 1305**	**5.73**

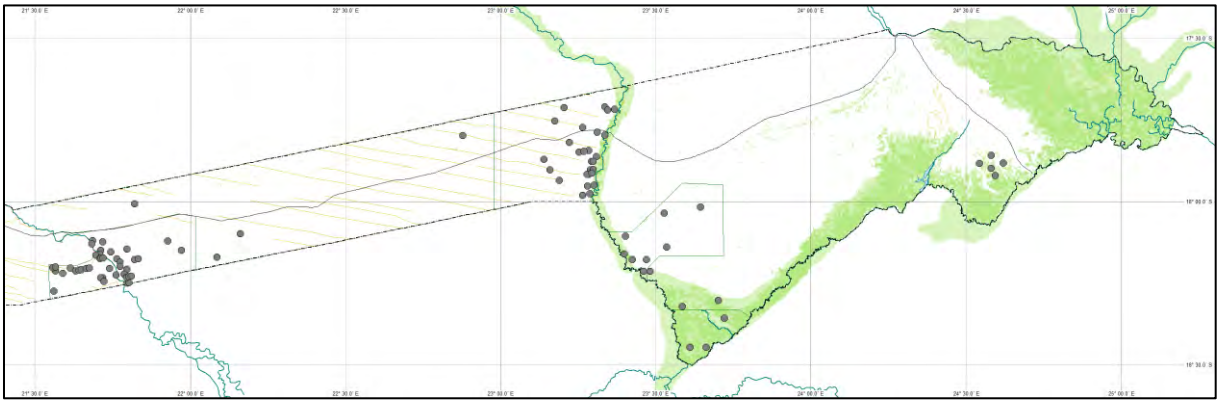

Figure 18 Sightings of kudu 2019

Table 23. Estimates of kudu numbers since 2013

	Estimate	PRP%	Source
2013	893	48.30	Craig & Gibson 2014
2014	619	47.80	Craig & Gibson 2015
2015	1056	56.70	Gibson & Craig 2015
2019	995	31.10	This report

2.2.14. Lechwe

Table 14. Estimates of Lechwe

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	925	281	0	76.2	281 - 1629	79.57
Babwata	0					
Susuwe	2434	689	172	37.1	1531 - 3336	214.63
Kwando North	0					
Kwando	1526	301	25	94.9	301 - 2975	100.88
East Zambezi North	0					
East Zambesi South	0					
Salambala	46	20	0	149.3	20 - 114	3.69
Overall	**4931**	**1291**	**197**	**35.8**	**3168 - 6694**	**28.37**

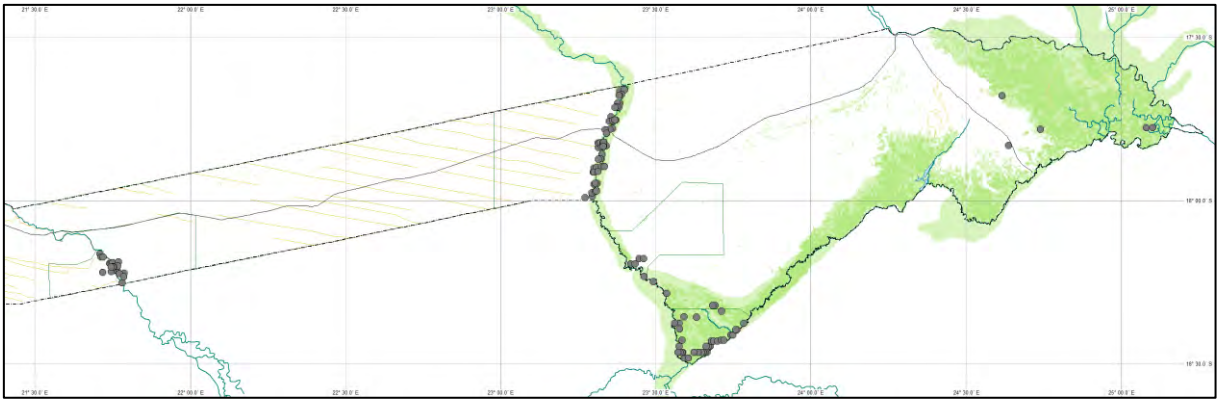

Figure 19 Sightings of lechwe 2019

Table 25 Estimates lechwe numbers since 2013

	Estimate	PRP%	Source
2013	2515	25.00	Craig & Gibson 2014
2014	3717	28.00	Craig & Gibson 2015
2015	3305	46.60	Gibson & Craig 2015
2019	4931	35.80	This report

2.2.15. Reedbuck

Table 15. Estimates of Reedbuck

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	15	5	0	185.5	5 - 44	1.33
Babwata	0					
Susuwe	48	19	0	98.7	19 - 95	4.2
Kwando North	17	2	0	146.6	2 - 43	2.61
Kwando	95	19	0	102.1	19 - 193	6.31
East Zambezi North	10	3	0	135.4	3 - 23	0.21
East Zambesi South	89	10	0	110.5	10 - 187	2.87
Salambala	0					
Overall	**275**	**58**	**0**	**53.4**	**128 - 421**	**1.58**

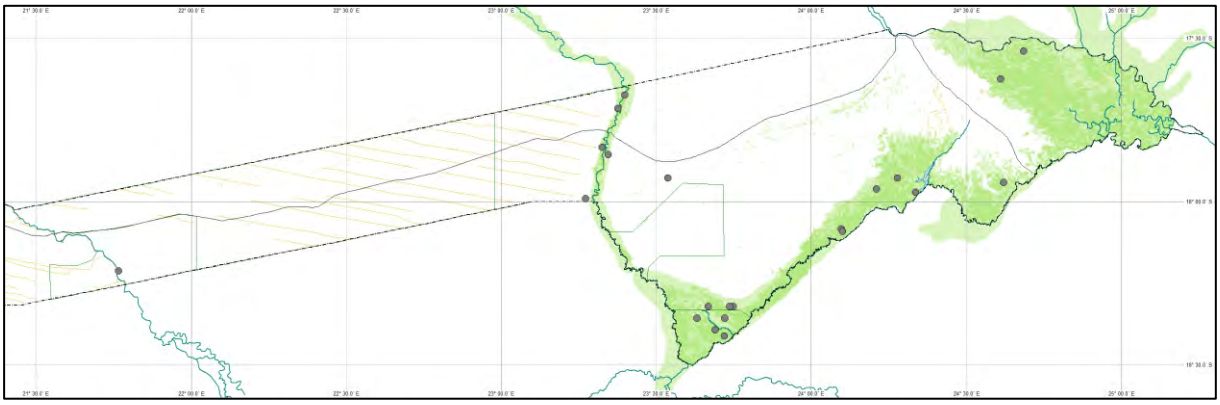

Figure 20 Sightings of reedbuck 2019

Table 27. Estimates of reedbuck numbers since 2013

	Estimate	PRP%	Source
2013	78	123.10	Craig & Gibson 2014
2014	142	47.90	Craig & Gibson 2015
2015	135	61.10	Gibson & Craig 2015
2019	275	53.40	This report

2.2.16. Roan antelope

Table 16. Estimates of Roan Antelope

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	77	24	4	60.2	31 - 123	6.63
Babwata	0					
Susuwe	99	31	2	80.5	31 - 178	8.7
Kwando North	0					
Kwando	149	29	2	88.1	29 - 280	9.84
East Zambezi North	0					
East Zambesi South	0					
Salambala	0					
Overall	**325**	**84**	**8**	**47.1**	**172 - 477**	**1.87**

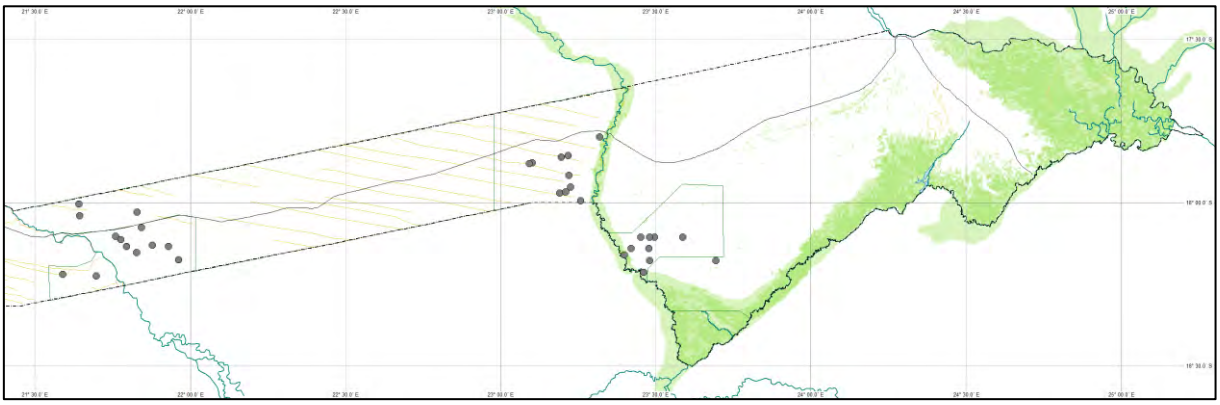

Figure 21 Sightings of roan 2019

Table 29. Estimates of roan numbers since 2013

	Estimate	PRP%	Source
2013	364	63.40	Craig & Gibson 2014
2014	345	84.80	Craig & Gibson 2015
2015	662	46.60	Gibson & Craig 2015
2019	325	47.10	This report

2.2.17. Sable antelope

Table 30. Estimates of Sable Antelope

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	852	263	157	51.6	412 - 1292	73.31
Babwata	19	2	0	195.0	2 - 56	0.5
Susuwe	839	239	55	39.3	509 - 1169	73.98
Kwando North	0					
Kwando	220	45	18	111.2	45 - 465	14.55
East Zambezi North	181	19	0	188.3	19 - 522	3.8
East Zambesi South	26	8	0	180.4	8 - 72	0.83
Salambala	0					
Overall	**2137**	**576**	**230**	**31.2**	**1470 - 2803**	**12.29**

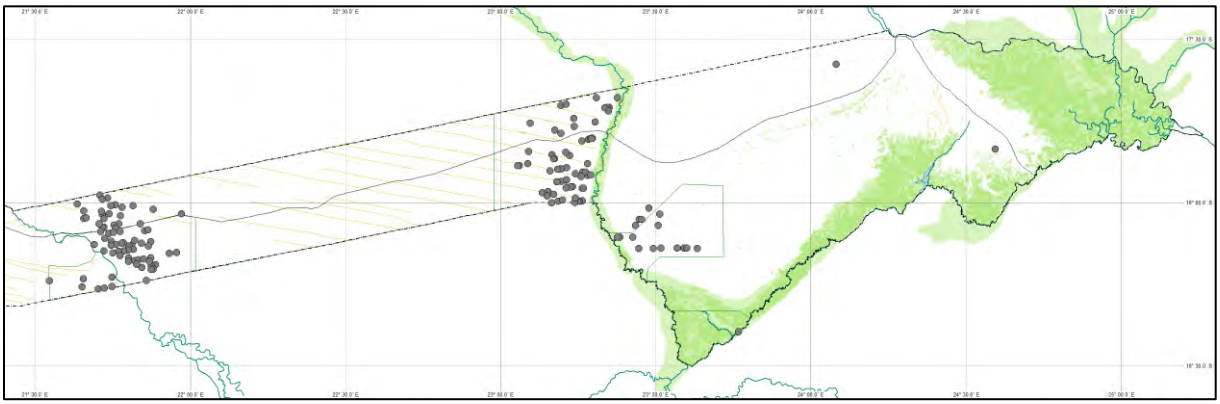

Figure 22 Sightings of sable 2019

Table 31. Estimates of sable numbers since 2013

	Estimate	PRP%	Source
2013	690	48.40	Craig & Gibson 2014
2014	1970	45.40	Craig & Gibson 2015
2015	1458	32.50	Gibson & Craig 2015
2019	2137	31.20	This report

2.2.18. Steenbok

Table 32. Estimates of Steenbok

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	10	3	0	100.3	3 - 20	0.85
Babwata	29	3	0	109.6	3 - 60	0.76
Susuwe	7	2	0	145.3	2 - 18	0.65
Kwando North	0					
Kwando	0					
East Zambezi North	10	1	0	190.2	1 - 28	0.2
East Zambesi South	10	1	0	187.0	1 - 27	0.31
Salambala	0					
Overall	**65**	**10**	**0**	**64.3**	**23 - 107**	**0.37**

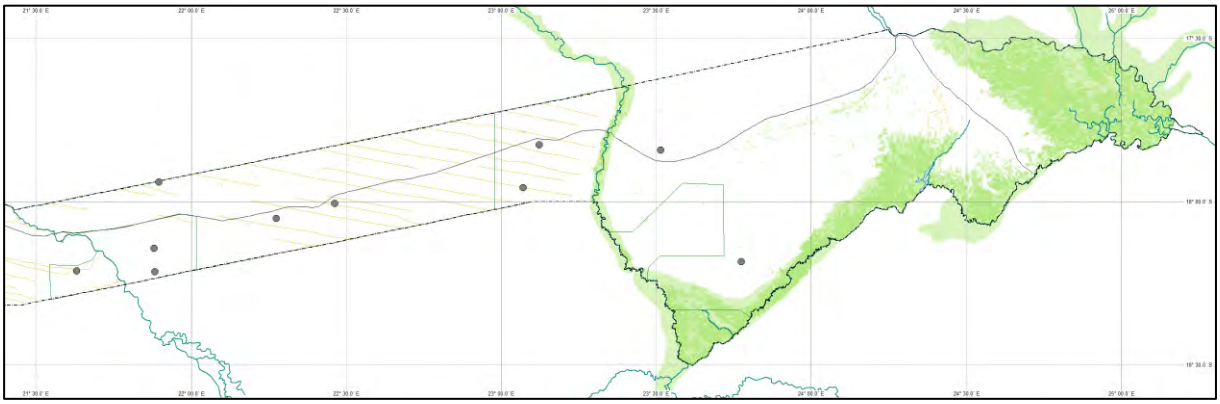

Figure 23 Sightings of steenbok 2019

2.2.19. Tsessebe

Table 17. Estimates of Tsessebe

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	22	7	0	188.3	7 - 62	1.86
Babwata	48	5	0	192.2	5 - 139	1.26
Susuwe	39	11	1	132.8	11 - 91	3.45
Kwando North	0					
Kwando	0					
East Zambezi North	0					
East Zambesi South	0					
Salambala	0					
Overall	**108**	**23**	**1**	**100.1**	**23 - 217**	**0.62**

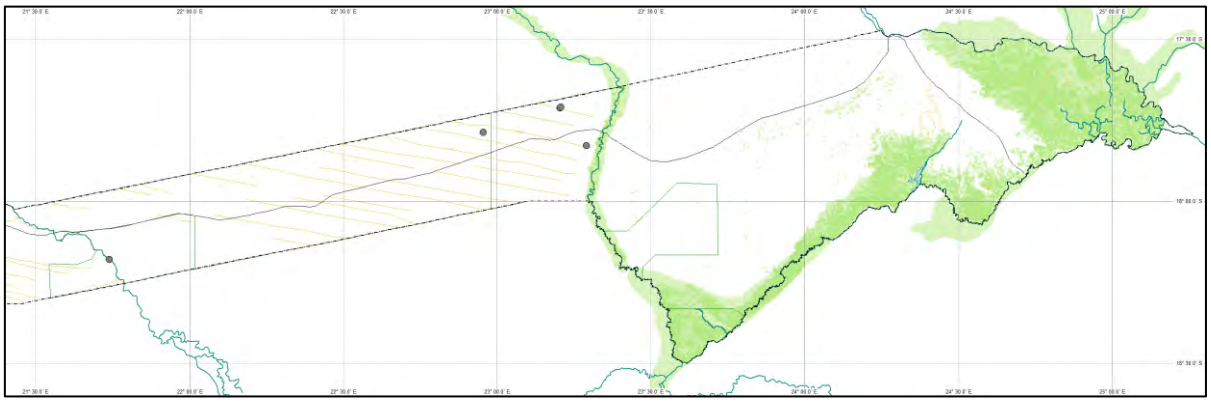

Figure 24 Sightings of tsessebe 2019

Table 34. Estimates of tsessebe numbers since 2013

	Estimate	PRP%	Source
2013	275	105.60	Craig & Gibson 2014
2014	87	106.90	Craig & Gibson 2015
2015	36	102.60	Gibson & Craig 2015
2019	108	100.10	This report

2.2.20. Warthog

The number of warthog was almost identical to the 2015 estimate.

Table 35. Estimates of Warthog

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	235	72	5	60.9	92 - 379	20.25
Babwata	48	5	0	192.2	5 - 139	1.26
Susuwe	187	56	0	35.1	121 - 252	16.46
Kwando North	0					
Kwando	537	108	2	65.5	185 - 889	35.48
East Zambezi North	56	17	0	145.3	17 - 137	1.17
East Zambesi South	60	13	0	114.3	13 - 130	1.95
Salambala	12	5	0	187.1	5 - 35	0.99
Overall	**1135**	**276**	**7**	**34.7**	**742 - 1529**	**6.53**

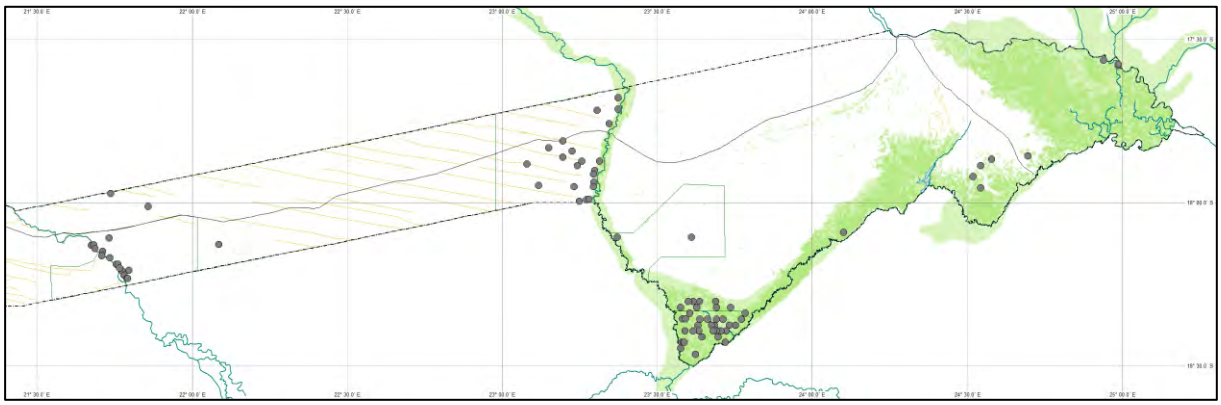

Figure 25 Sightings of warthog 2019

Table 36. Estimates of warthog numbers since 2013

	Estimate	PRP%	Source
2013	1385	35.80	Craig & Gibson 2014
2014	800	30.20	Craig & Gibson 2015
2015	1124	43.40	Gibson & Craig 2015
2019	1135	34.70	This report

2.2.21. Waterbuck

Table 37. Estimates of Waterbuck

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	72	22	0	98.3	22 - 142	6.16
Babwata	0					
Susuwe	27	6	0	176.7	6 - 74	2.35
Kwando North	0					
Kwando	66	14	28	120.2	14 - 145	4.36
East Zambezi North	0					
East Zambesi South	0					
Salambala	7	3	0	186.8	3 - 21	0.58
Overall	**171**	**45**	**28**	**64.9**	**60 - 283**	**0.99**

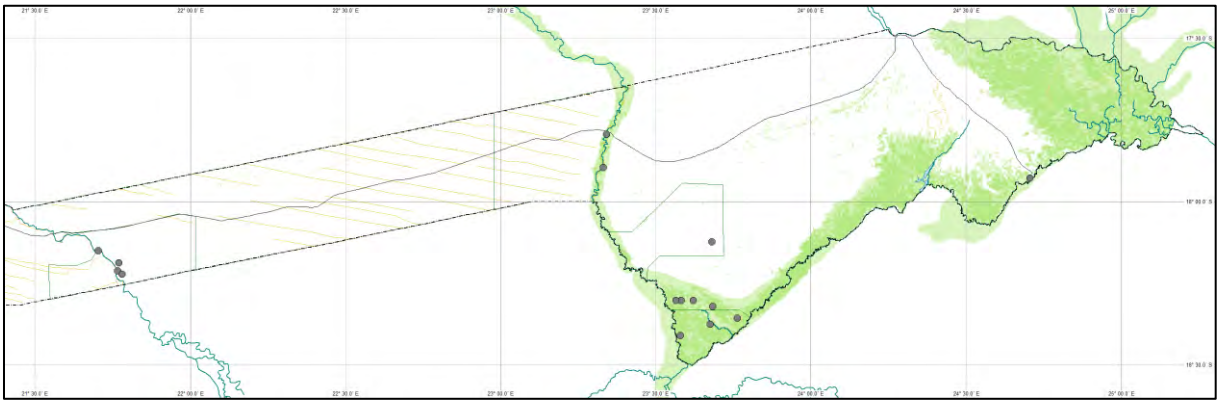

Figure 26 Sightings of waterbuck 2019

Table 38. Estimates of waterbuck numbers since 2013

	Estimate	PRP%	Source
2013	20	174.10	Craig & Gibson 2014
2014	58	101.00	Craig & Gibson 2015
2015	344	113.40	Gibson & Craig 2015
2019	171	64.90	This report

2.2.22. Wildebeest

Table 39. Estimates of Wildebeest

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km²
Buffalo / Mahango	93	30	0	183.4	30 - 263	7.98
Babwata	0					
Susuwe	56	16	4	114.9	16 - 121	4.98
Kwando North	0					
Kwando	265	55	20	127.9	55 - 605	17.54
East Zambezi North	171	55	4	188.8	55 - 495	3.59
East Zambesi South	792	248	126	118.9	248 - 1733	25.55
Salambala	105	45	0	136.8	45 - 249	8.44
Overall	**1483**	**449**	**154**	**71.6**	**449 - 2545**	**8.53**

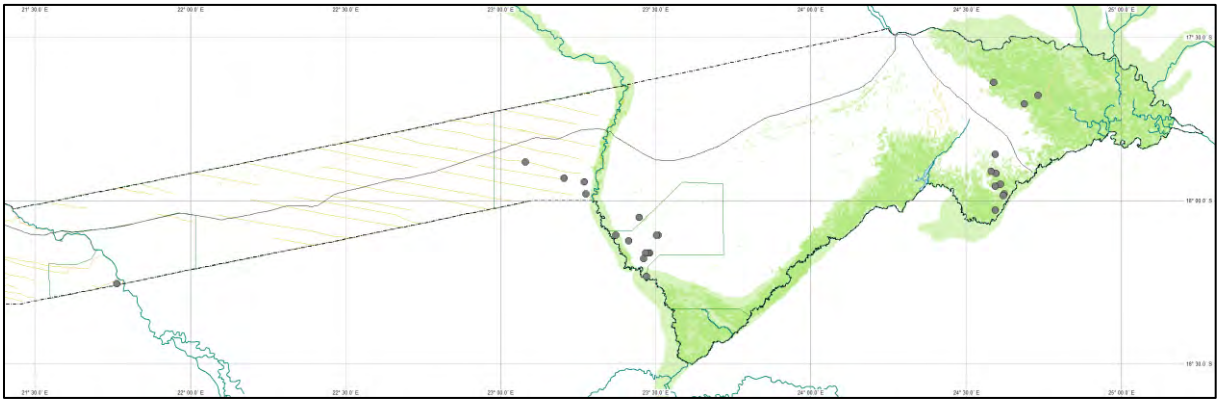

Figure 27 Sightings of wildebeest 2019

Table 40. Estimates of wildebeest numbers since 2013

	Estimate	PRP%	Source
2013	317	72.60	Craig & Gibson 2014
2014	1554	74.20	Craig & Gibson 2015
2015	1687	85.60	Gibson & Craig 2015
2019	1483	71.60	This report

2.2.23. Zebra

Zebra numbers in 2019 were double the 2015 estimates (4856 ± 81.8) and they were more widely distributed (Figs 28 & 29). They were seen in grasslands near water but appear to avoid human habitation.

Table 41. Estimates of Zebra

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	192	58	28	64.9	67 - 316	16.48
Babwata	29	3	0	192.1	3 - 84	0.76
Susuwe	731	210	68	56.0	322 - 1140	64.47
Kwando North	0					
Kwando	957	194	59	74.4	245 - 1669	63.25
East Zambezi North	1412	433	250	96.7	433 - 2778	29.6
East Zambesi South	4864	867	897	78.2	1058 - 8669	156.95
Salambala	2582	1079	1563	48.6	1326 - 3838	207.42
Overall	**10767**	**2844**	**2865**	**39.6**	**6501 - 15032**	**61.95**

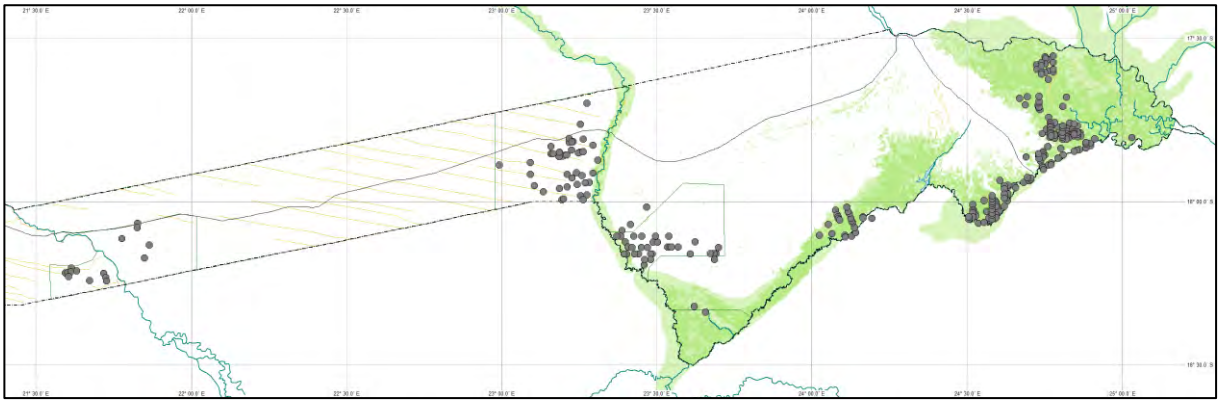

Figure 28 Sightings of zebra 2019

Table 42. Estimates of zebra numbers since 2013

	Estimate	PRP%	Source
2013	1421	44.50	Craig & Gibson 2014
2014	5435	61.20	Craig & Gibson 2015
2015	4856	81.80	Gibson & Craig 2015
2019	10767	39.60	This report

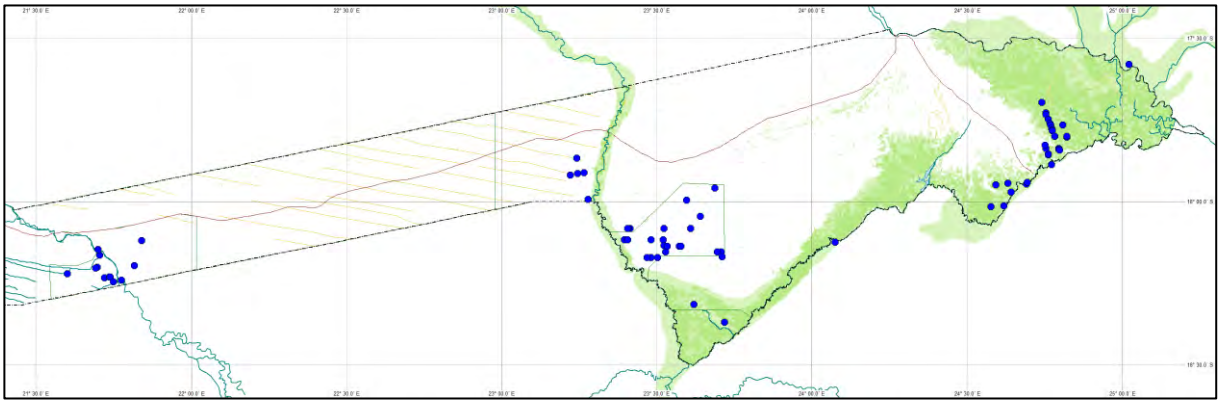

Figure 29 Sightings of zebra 2015

2.2.24. Carnivores

Too few carnivores were seen to provide population estimates. 4 hyaena, 4 black-backed jackal and 2 lions were observed during the survey.

2.2.25. Crocodiles

Table 43. Estimates of Crocodile

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	215	67	0	45.5	117 - 313	18.53
Babwata	0					
Susuwe	91	29	0	47.1	48 - 134	8.04
Kwando North	0					
Kwando	45	9	3	153.6	9 - 114	2.98
East Zambezi North	3	1	0	184.6	1 - 9	0.07
East Zambesi South	0					
Salambala	48	20	4	65.9	20 - 79	3.84
Overall	**403**	**126**	**7**	**31.1**	**277 - 528**	**2.32**

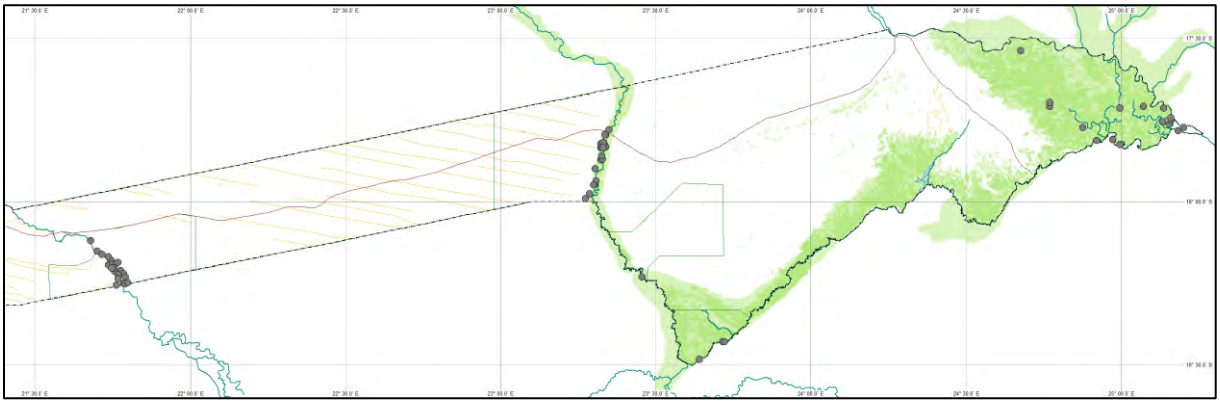

Figure 30 Sightings of crocodile 2019

Crocodiles were seen in most water bodies. Sample counts are not suitable for estimating numbers of crocodiles and the numbers were underestimated.

Table 44. Estimates of crocodiles numbers since 2013

	Estimate	PRP%	Source
2013	557	47.10	Craig & Gibson 2014
2014	651	29.70	Craig & Gibson 2015
2015	707	35.40	Gibson & Craig 2015
2019	403	31.10	This report

2.2.26. Carcasses of species other than elephant

Decay stages of carcasses described for elephants in Appendix II below were used to classify carcasses of other species. It isn't possible to identify the species of many of these carcasses and some may be elephants.

Table 45. Estimates of carcasses of species other than elephants

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Carcass 1						
Buffalo / Mahango	7	2	0	130.0	2 - 15	0.56
Kwando	5	1	0	198.7	1 - 15	0.34
East Zambezi North	3	1	0	191.0	1 - 9	0.07
Salambala	7	3	0	141.7	3 - 18	0.58
Carcass 1 Overall	**22**	**7**	**0**	**78.3**	**7 - 39**	**0.13**
Carcass 2						
Buffalo / Mahango	10	3	0	138.0	3 - 24	0.85
Susuwe	7	3	0	144.5	3 - 18	0.66
Kwando	35	7	0	99.0	7 - 70	2.33
East Zambesi South	22	3	0	116.2	3 - 48	0.72
Salambala	5	2	0	134.6	2 - 11	0.38
Carcass 2 Overall	**80**	**18**	**0**	**57.3**	**34 - 125**	**0.46**
Carcass 3						
Buffalo / Mahango	13	4	0	79.3	4 - 23	1.1
Babwata	10	1	0	192.1	1 - 28	0.25
Susuwe	15	4	0	94.9	4 - 29	1.3
Kwando	5	1	0	188.7	1 - 14	0.31
Salambala	5	2	0	133.6	2 - 11	0.37
Carcass 3 Overall	**46**	**12**	**0**	**56.8**	**20 - 73**	**0.27**
Carcass 4						
Buffalo / Mahango	29	9	0	84.2	10 - 48	2.48
Babwata	29	3	0	106.7	3 - 59	0.76
Susuwe	47	15	1	44.0	26 - 67	4.13
Kwando	60	12	0	63.1	22 - 98	3.98
East Zambezi North	13	2	0	148.9	2 - 32	0.27
Salambala	14	6	0	75.8	6 - 25	1.13
Overall	**191**	**47**	**1**	**30.3**	**133 - 249**	**1.1**

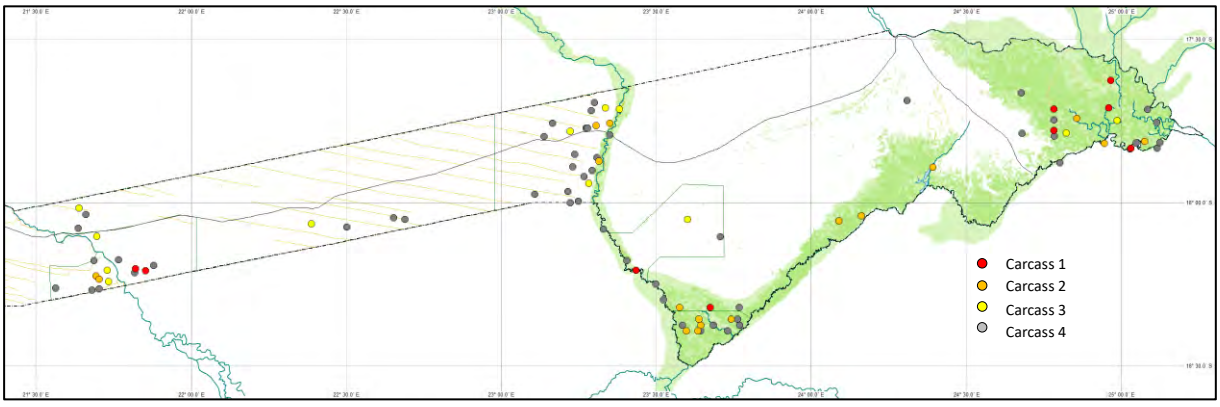

Figure 31 Sightings of carcasses (other than elephants) 2019

2.2.27. Ground Hornbill

Ground hornbills were only seen in the east of the region in small numbers. The estimated number was small and much lower than in 2015. The estimate was imprecise.

Table 46. Estimates of ground hornbill

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	0					
Babwata	0					
Susuwe	0					
Kwando North	0					
Kwando	0					
East Zambezi North	0					
East Zambesi South	29	3	0	188.1	3 - 82	0.92
Salambala	2	1	0	189.2	1 - 7	0.2
Overall	**31**	**4**	**0**	**172.1**	**4 - 84**	**0.18**

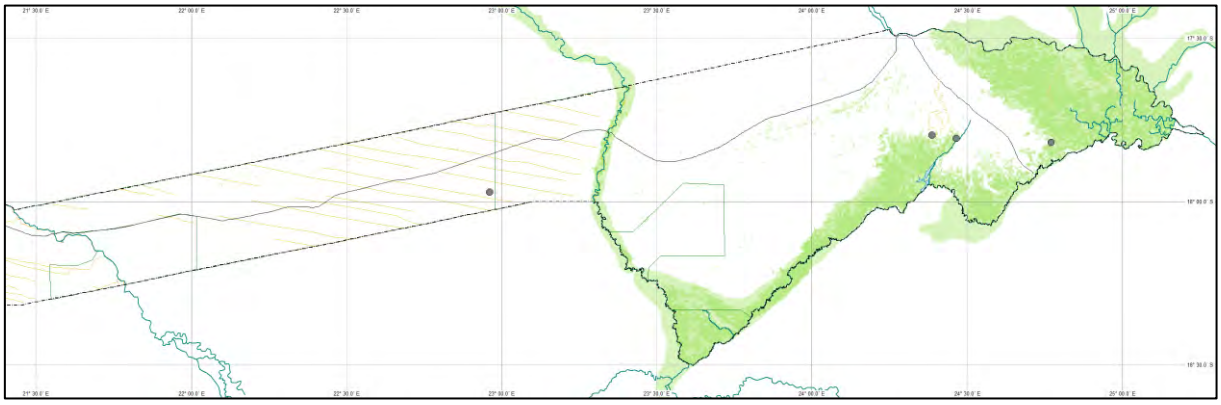

Figure 32 Sightings of ground hornbills 2019

Table 47. Estimates of ground hornbill numbers since 2013

	Estimate	PRP%	Source
2013	95	89.60	Craig & Gibson 2014
2014	5	49.70	Craig & Gibson 2015
2015	207	64.80	Gibson & Craig 2015
2019	31	172.10	This report

2.2.28. Ostrich

Table 48. Estimates of ostrich

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Buffalo / Mahango	36	11	14	105.4	11 - 74	3.12
Babwata	38	4	0	150.3	4 - 95	1.01
Susuwe	12	4	2	141.1	4 - 30	1.09
Kwando North	0					
Kwando	0					
East Zambezi North	3	1	0	189.1	1 - 10	0.07
East Zambesi South	0	0	1		0 - 0	0
Salambala	0					
Overall	**90**	**20**	**17**	**76.1**	**22 - 159**	**0.52**

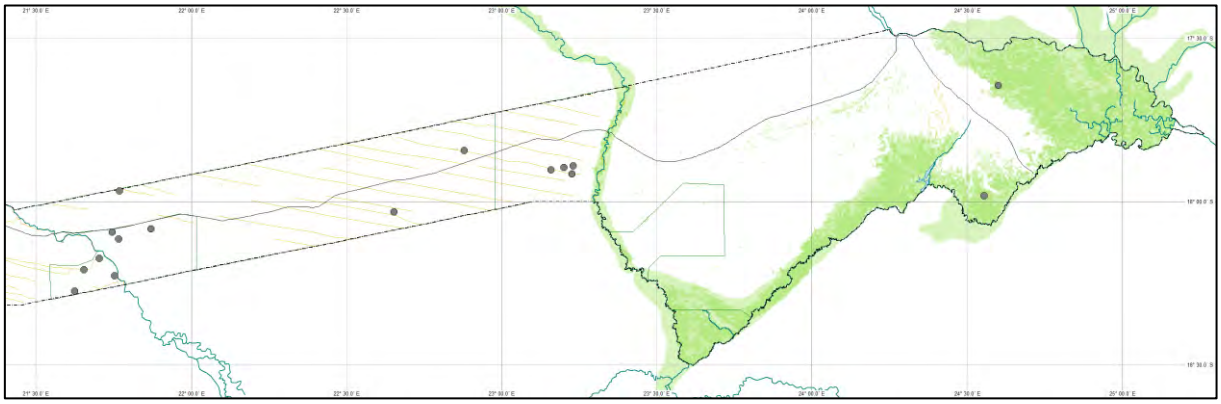

Figure 33 Sightings of ostrich 2019

2.2.29. Observations of Domestic Livestock

The estimated number of cattle was almost identical to the 2015 estimate. Numbers of sheep/goats were not significantly different from 2015. No donkeys were seen.

Table 49. Estimates of domestic livestock

	Pop. Est.	No. in	No. out	PRP%	95% Range	No./100 km^2
Domestic Pig						
East Zambezi North	100	31	0	138.8	31 - 239	2.09
Salambala	33	14	0	134.5	14 - 77	2.63
Pigs Overall	133	45	0	108.2	45 - 276	0.76
Horses						
Babwata	29	3	0	192.1	3 - 84	0.76
East Zambesi South	3	1	0	180.5	1 - 9	0.11
Horses Overall	**32**	**4**	**0**	**167.6**	**4 - 85**	**0.18**
Sheep and/or Goats						
Buffalo / Mahango	338	108	0	177.8	108 - 939	29.08
Babwata	315	33	0	128.6	33 - 719	8.31
Kwando	374	77	0	101.5	77 - 753	24.69
East Zambezi North	2274	277	0	51.2	1111 - 3438	47.66
East Zambesi South	3211	482	38	43.6	1810 - 4611	103.61
Salambala	327	137	18	71.8	137 - 562	26.28
Shoats Overall	**6838**	**1114**	**56**	**28.9**	**4862 - 8815**	**39.35**
Cattle						
Buffalo / Mahango	383	115	73	87.6	115 - 719	32.96
Bwabwata	1679	176	47	128.6	176 - 3838	44.3
Susuwe	891	284	20	54.8	403 - 1379	78.59
Kwando North	4748	546	0	64.9	1667 - 7829	712.93
Kwando	5839	1194	210	57.9	2460 - 9218	385.95
East Zambezi North	55292	11102	4981	13.9	47605 - 62980	1158.69
East Zambesi South	41695	6307	2879	30.1	29132 - 54258	1345.42
Salambala	25350	10680	8346	21.6	19877 - 30824	2036.17
Cattle Overall	**135878**	**30404**	**16556**	**12.0**	**119628 - 152127**	**781.8**

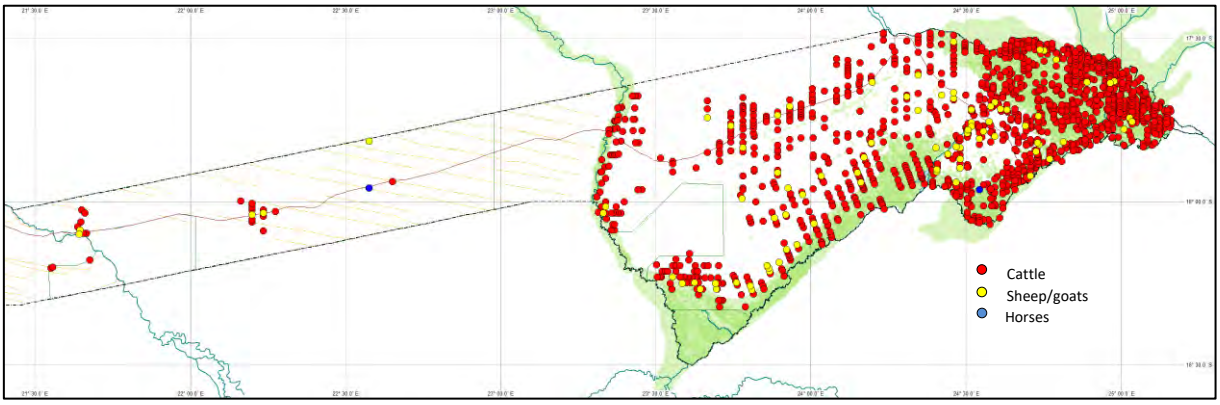

Figure 34 Sightings of domestic livestock 2019

2.2.30. Other Observations – human activity and settlement

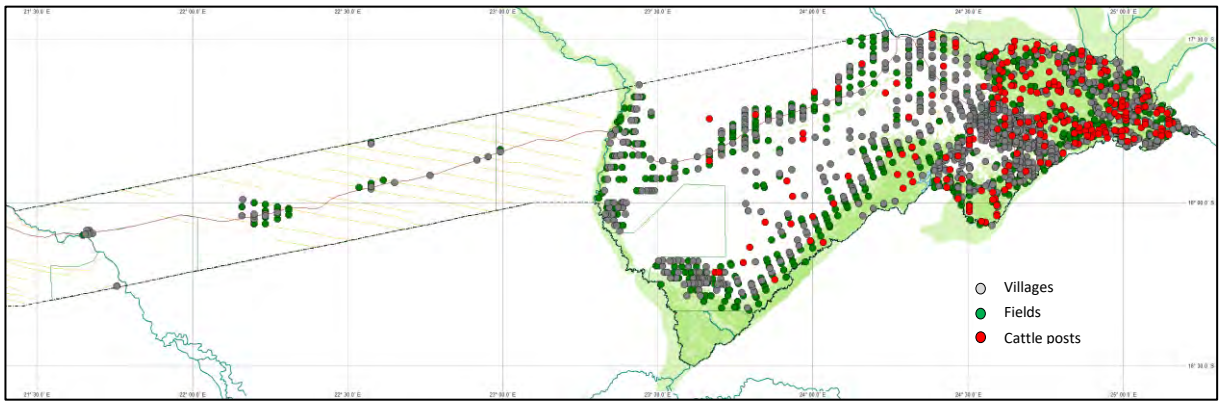

Figure 35 Sightings of villages, cultivation and cattle posts 2019

2.2.31. Other Observations – fishing activities

As usual, canoes, fish traps and nets and fishing camps were seen on all water bodies of eastern Zambezi region. Many of the canoes were lying on dry land in seasonally flooded areas.

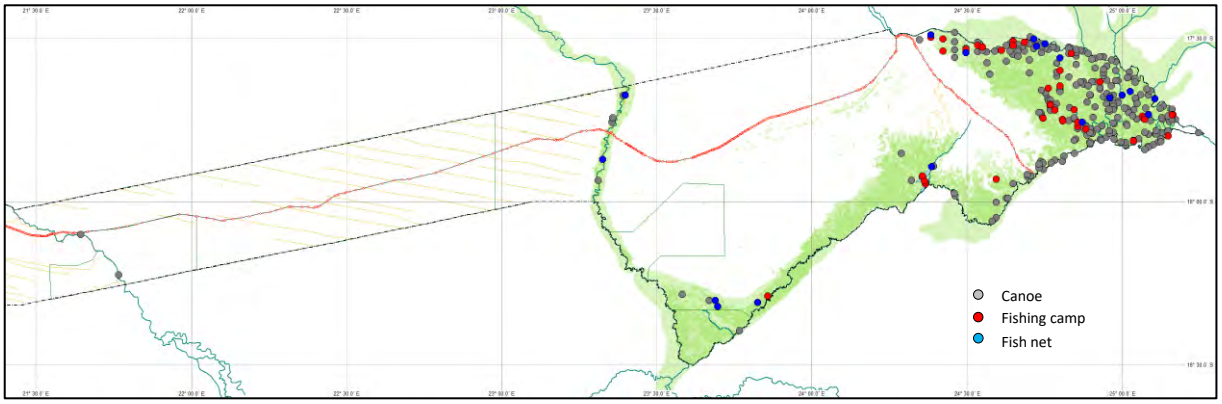

Figure 36 Sightings of activities relevant to fishing 2019

2.2.32. Other Observations – fire

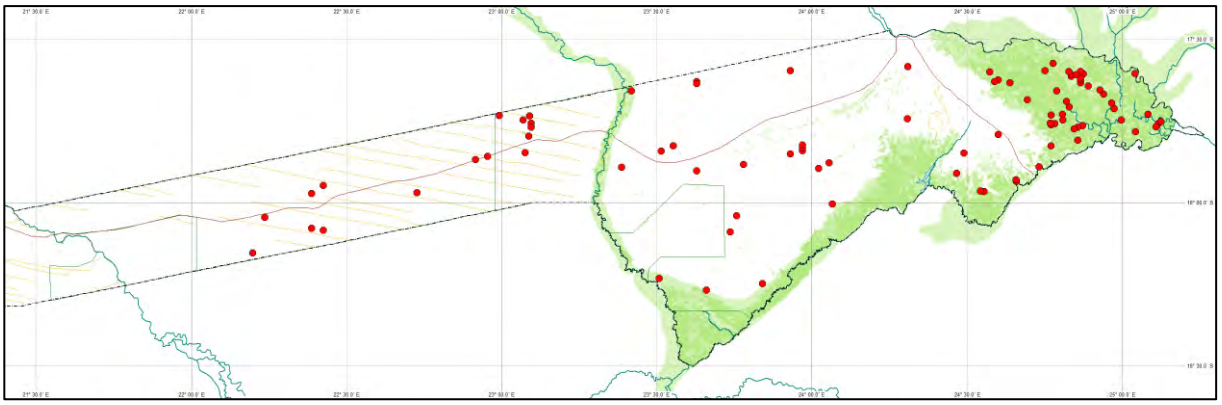

Figure 37 Sightings of active fires 2019

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APPENDIX I: METHODS

Methods followed CITES aerial survey standards using stratified systematic transect sampling (Norton Griffiths, 1978) with analysis using Jolly's method for unequal size sampling units (Jolly, 1969).

a. Survey design

As mentioned above, the same strata were used as those in previous surveys (eg Gibson & Craig 2015). Additional strata were added in the eastern Zambezi with the aim of improving the precision of estimates of zebra and other species (Fig.1).

b. Sampling intensity

Like previous surveys of the regions, sampling intensities were designed to maximise the precision of elephant estimates.

Higher precision was required particularly for the core areas and for the eastern Zambezi region. In order to achieve sampling intensities of up to 30% for such areas, it would be necessary to space transects as little as 1.3 km apart. With strip widths of 200m per side and a 100m dead zone under the aircraft, this would leave a distance between transects of 800m outside the strip markers. Any deviation from track could cause double counting, as well as disturbing animals on adjacent transects and assumptions made in the calculation of precision would be violated. Transects in these strata were therefore divided into interleaved sets, each representing a separate 10% coverage, the results of which were combined in the final analysis. This had the additional advantage that in the event of the survey not being completed, a full coverage might still be available, albeit at a lower sampling intensity.

The south-eastern and south-western strata were flown together but separated for analysis to accommodate the overlap between the Rooikat south and East Zambezi South (see Table 47). The estimated numbers of animals were calculated as a mean of the individual estimates. The combined variances were calculated as $V= \Sigma v/n^2$ (n is the number of surveys).

c. Selection of transects

Transects were evenly spaced according to the required sampling intensity from a randomly chosen start point and oriented at right angles to major features (eg rivers) in each stratum, as far as possible (Fig. 35).

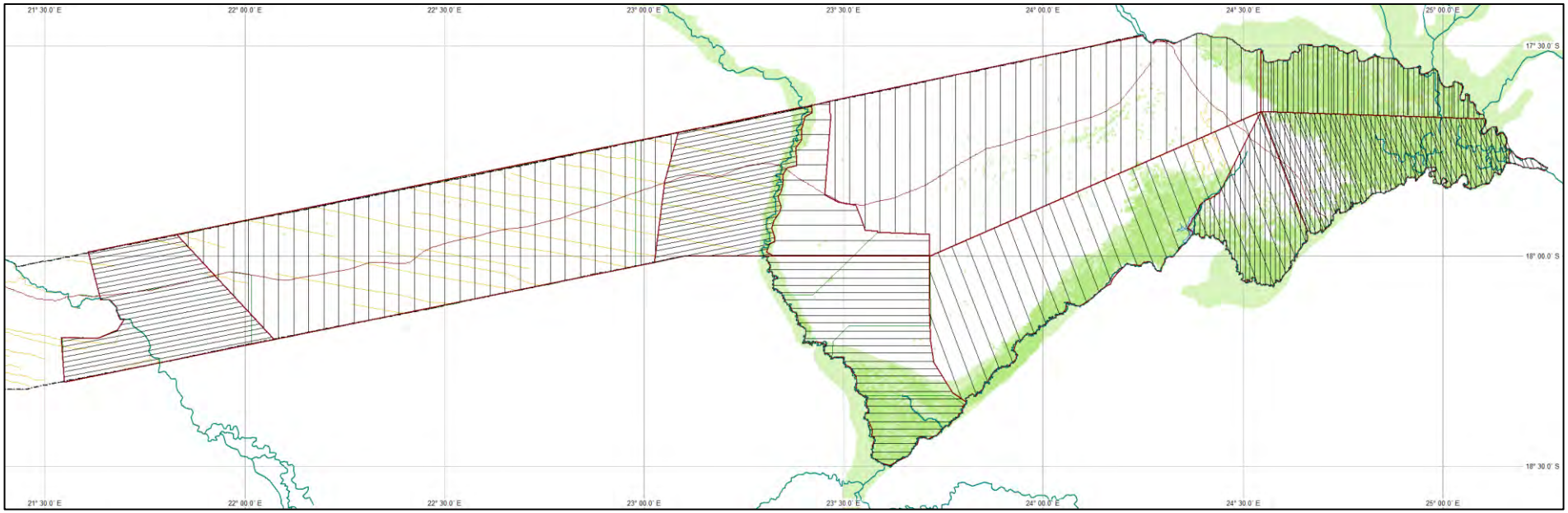


Figure 38 Transects selected for the 2019 survey

d. Calibration

Sampling strips were demarcated by rods attached to the lift struts on each side of the aircraft.

These were calibrated for each observer by flying at varying heights across numbers marked 10m apart on a level airstrip (Fig39).

The observers called the inner and outer numbers seen between the rods. The difference + 10 between these numbers gave a distance that was adjusted for 300 ft a.g.l. and the mean used as the calibrated strip width for each observer.

Figure 39 Calibration of observation strips

e. Data collection

The aircraft, a Cessna 182 was flown at a nominal height of 300 feet above ground level along the transects. Height was maintained using a Lightware SF11 laser rangefinder fitted in the starboard wing of the aircraft (Fig. 40). A backup SF30 laser rangefinder was also installed in the wing in case of equipment failure.

Figure 40 Installation of laser rangefinders in the aircraft wing

Figure 41 Flightlogger display of height a.g.l. . (pilot's GPS mounted on the control yoke)

Data from the rangefinder were streamed to a tablet in which the Vulcan Flightlogger App was installed to interpret and display it (Fig 41).

All incoming heights, speeds and location information were recorded at 1 second intervals for use in later analyses along with a time-stamp for each record.

Accurate navigation along each transect was achieved using an up-loaded display of transect coordinates using the Forelight App on an ipad. Tracklogs of all flights were recorded in both the Garmin GPS and the Vulcan Flightlogger. The observers called out animals and other parameters seen from their fixed positions in the rear seats. They distinguished between sightings within and outside the sampling rods. This information was recorded by the front seat observer on paper datasheets. The position of each sighting was "marked" in a Garmin 64S GPS.

f. Searching rate

The searching rate (km^2/hr) was calculated for each transect and the mean for each stratum provided as an objective indication the survey quality.

g. Data analysis

Jolly's (1969) method for blocks of unequal size was used to calculat estimates of density and variance for each species in each stratum as follows:

$$R = \frac{\sum_{i=1}^{n} y_i}{\sum_{i=1}^{n} z_i}$$

$$\hat{Y} = Z.R$$

$$V_{\hat{Y}} = \frac{N(N-n)}{n}.(s_y^2 - 2.R.s_{zy} + R^2.s_z^2)$$

where:

R = density of animals
Y = total number estimated
Z = total area of stratum
y_i = number of animals counted in transect i
z_i = area of transect i
n = number of transects
N = number of transects possible in stratum where $N = n.Z/\Sigma z$
s_y^2 = variance of number seen per transect
s_z^2 = variance of transect areas
s_{zy} = covariance between number seen per transect and transect area
V_y = variance of estimated number in stratum (i.e. variance of Y)

Overall estimates and variances were obtained from the sums of the stratum estimates and their variances.

The term $N(N-n)/n$ approaches zero as sampling intensity approaches 100%. Its application makes the assumption that all animals in the sample are seen once. This is violated if animals can move between transects during the survey, as can happen if transects are closely spaced or the survey cannot be completed in one flight. This is why some strata have repeated samples at 10%, rather than a single coverage at a higher intensity (see below). For example four 10% samples are the equivalent of a 40% sampling intensity to produce an overall estimate from the mean of the four resultant estimates. When merging separate coverages to give a mean estimate, the estimated numbers of animals were calculated as a mean of the individual estimates. Combined variances were calculated as $V= \Sigma v/n^2$ where n is the number of surveys.

The standard error (*SE*) of the estimate is the square root of the variance and the 95% confidence limits of the estimate is $Y \pm t \,.\, SE$, where t is Student's t for a two-tailed probability of 0.05 and n-1 degrees of freedom.

h. Calculation of heights above ground level

Data streamed from the laser rangefinder was captured by the Flightlogger app. A height record was acquired every second along with a date/time stamp and GPS location. These data were downloaded into MS Excel for analysis.

i. Elephant sightings, carcass classification and ratios

Elephants were recorded as being in family groups or bull groups, defined as follows:

Family groups - herds in which females and young are present. Any bulls in the group are counted as part of the group.

Bull groups - single bulls or herds which contain no females or juveniles.

Carcasses were classified into four categories according to their estimated time since death ((Douglas-Hamilton & Hillman 1981; Douglas-Hamilton & Burril 1991)).

The four classes are:

Carcass 1 - Fresh (<1 month): skin covered, with flesh present giving the body a rounded appearance; vultures often present; ground still moist from body fluids.

Carcass 2 - Recent (<1 year): rot patch still visible; hide still attached to carcass; bones not scattered

Carcass 3 - Old (>1 year): skin absent; bones not scattered; vegetation re-grown in rot patch.

Carcass 4 - Very old (up to 10 years): bones bleached and scattered.

The estimated time since death of carcasses may vary between regions as the rate of decomposition depends on a number of factors such as moisture and temperature.

A "carcass ratio" defined as the ratio of dead elephants to all elephants (dead plus live animals).

Douglas-Hamilton *et al.* (Douglas-Hamilton & Hillman 1981; Douglas-Hamilton & Burril 1991) suggest a carcass ratio of 2 - 8% as being normal for a stable or increasing population, while a ratio of over 9% indicates a declining population.

j. Mapping wildlife distribution

For most species, the positions of the sightings were simply plotted on a map of the area without accounting for the relative numbers of animals per sighting or the sampling intensity at which the sighting was made.

A contoured map was produced to show the distribution of elephant densities. This was done by calculating the density of animals in cells measuring 1/30 degrees. These cells were filtered using a moving average. Empty cells were filled using Voronoi polygons surrounding the nearest filled cells. Resolution was doubled four times, filtering each time and cell values were converted to integer values of log (base2) density. Contours were produced by shading according to $\log_2$ density. This results in density doubling for each contour.

APPENDIX II: RESULTS

The survey crew comprised R. Odendaal (pilot), C. Craig (front-seat recorder/coordinator), N. Chitemamuswe (left hand observer) and F. Muroki (right hand observer), M. Brassine (data capture/alternative right hand observer/driver), T. Sirika (ground support/cook).

Figure 42 Crew in action

Supporting data indicating survey quality are given below.

Track logs of the transects flown are shown in Fig. 41.

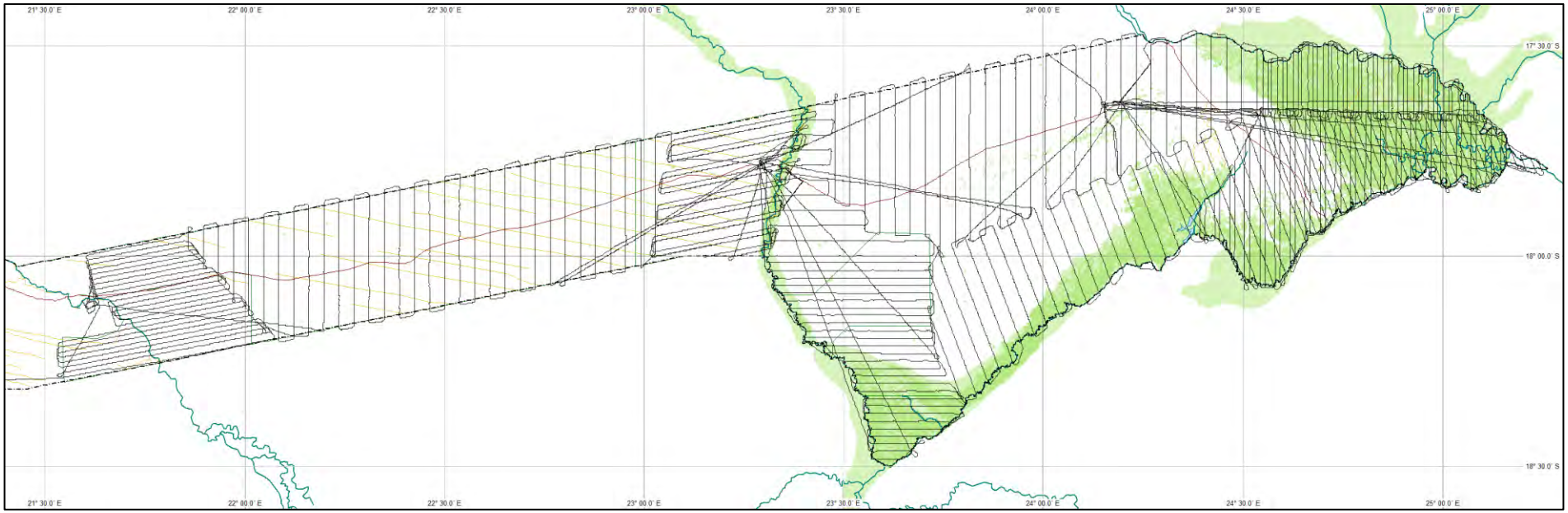


Figure 43 Tracks flown on the 2019 Zambezi survey

a. Stratum statistics:

Table 50. Stratum combinations for analysis, with sampling intensities and areas of strata

STRATUM NAME	STRATUM CODES	Sampling intensity	Area km²
ZAMBEZI REGION OVERALL			**17380**
Buffalo/Mahango Mean	**(BUFA,BUFB,BUFC)**		**1162**
Mahango + Buffalo A	BUFA	10.79%	
Mahango + Buffalo B	BUFB	10.34%	
Mahango + Buffalo C	BUFC	9.77%	
Babwata General Use Area	**BAB**	10.48%	**3789**
Kwando Core Area Mean	**(SUSA(Mean),SUSC)**		**1134**
SusA Mean	*SUSA, SUSAR*		
Kwando Core Area	SUSA	9.97%	
Kwando Core Area	SUSAR	10.13%	
Kwando Core Area C	*SUSC*	10.32%	
Kwando Overall	**KW (Mean) + KWN**		**2179**
Kwando Mean	*(KWA,KWB)*		
Kwando A	KWA	10.62%	
Kwando B	KWB	9.68%	
Kwando North	**KWN**	11.50%	
East Zambezi North	**(ECNW + RKN)**		**4772**
East Zambezi North (West part)	*ECNW*	10.49%	
Rooikat North Mean	*(ECNE, RKNA, RKNB)*		
East Zambezi North (East part)	ECNE	10.08%	
Rooikat North A	RKNA	10.13%	
Rooikat North B	RKNB	10.70%	
East Zambezi South	**(ECSW+Rooikat S Mean)**		**3099**
East Zambezi South - W part	ECSW	10.52%	
Rooikat South Mean	*(ECSE,RKSAW,RKSBW)*		
East Zambezi South - E part	ECSE	10.52%	
Rooikat South A W part	RKSAW	10.42%	
Rooikat South B W part	RKSBW	10.18%	
Salambala Mean	**(SALA, SALB, RKSAE, RKSBE)**		**1245**
Rooikat South A - East Part	RKSAE	10.42%	
Rooikat South B - East Part	RKSBE	10.18%	
Salambala-Impalila A	SALA	10.63%	
Salambala-Impalila B	SALB	10.99%	

Table 51. Stratum statistics:

Area = km^2 ; No. trans = number of transects in stratum; SI% = sampling intensity; trans time = total flight time on transects; total length = total length of transects in km; ground speed = knots; search rate = km^2/min

Mean heights and speeds are calculated from the flight log (148549 records)

Stratum	No. Trans	Trans time	Sample area km^2	Total transect Length km	Ground speed (knots)	Search Rate
Bwabwata	33	5.55	394.5	965.06	93.91	1.18
Buffalo/Mahango A	8	1.77	123.9	301.69	92.23	1.17
Buffalo/Mahango B	9	1.65	118.7	289.01	94.88	1.20
Buffalo/Mahango C	8	1.61	111.3	277.35	92.83	1.15
E Zambezi North	43	6.31	493.0	1200.46	102.82	1.30
E Zambezi South	26	4.32	324.1	792.55	99.14	1.25
Kwando A	14	2.27	159.4	388.02	92.12	1.17
Kwando B	13	2.28	145.8	363.19	85.86	1.06
Kwando N	11	1.02	76.6	186.43	99.14	1.26
Salambala/Impalila A	16	1.92	132.4	322.30	90.72	1.15
Salambala/Impalila B	17	1.80	136.5	332.41	99.68	1.26
Susuwe A	9	1.68	111.6	278.00	89.42	1.11
Susuwe B	10	1.64	114.2	278.00	91.37	1.16
Susuwe C	9	1.66	116.1	289.32	94.01	1.16
Rooikat N A	15	1.05	79.6	193.74	99.31	1.26
Rooikat N B	15	1.07	84.4	205.46	104.11	1.32
Rooikat S A	21	2.70	202.5	493.01	98.66	1.25
Rooikat S B	21	2.63	198.8	495.14	101.52	1.26
Overall	**298**	**42.93**	**3123.4**	**7651.13**	96.23	**1.21**

b. *Calculation of strip width*

The results of the strip width calibration are given below. Messrs Muroki and Chitemamuswe were left and right observers respectively. Ms Brassine replaced Mr Muroki on the left for a few strata.

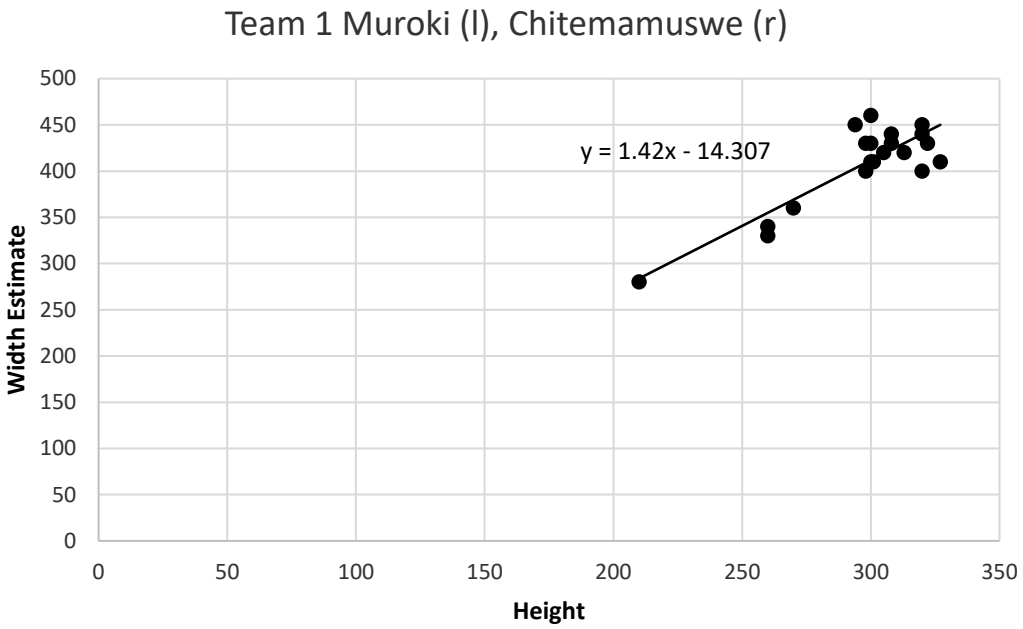
These calibrated strip widths were used for both the Zambezi Region and the Khaudum/Nyae Nyae surveys.

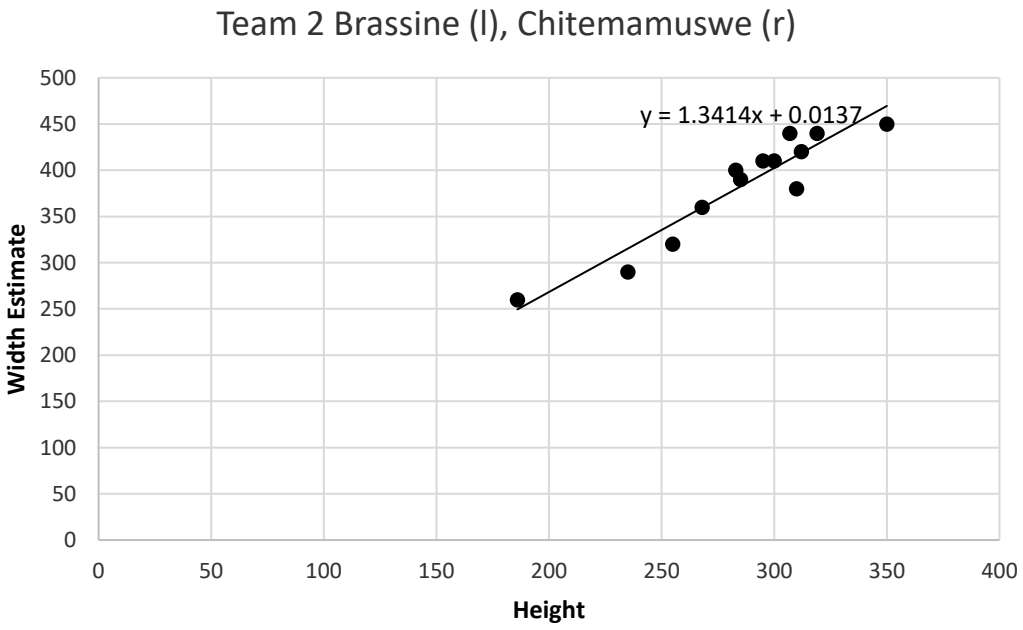
Calibration (1) V5 WOT (Left Muroki, Right Chitemamuswe)

Height a.g.l.		LEFT		RIGHT		WIDTH		WIDTH CORRECTED		TOTAL WIDTH
Pressure	Laser	in	out	in	out	Left	Right	Left	Right	
304	300	6	26	13	32	210	200	210.00	200.00	410.00
298	298	8	26	10	30	190	210	191.28	211.41	402.68
322	320	9	29	12	34	210	230	196.88	215.63	412.50
303	300	7	26	9	34	200	260	200.00	260.00	460.00
305	308	7	28	10	31	220	220	214.29	214.29	428.57
306	308	7	28	10	30	220	210	214.29	204.55	418.83
320	322	6	25	10	32	200	230	186.34	214.29	400.62
290	294	7	29	12	33	230	220	234.69	224.49	459.18
310	327	9	27	10	31	190	220	174.31	201.83	376.15
302	300	8	28	13	34	210	220	210.00	220.00	430.00
300	301	8	26	9	30	190	220	189.37	219.27	408.64
300	313	8	27	11	32	200	220	191.69	210.86	402.56
260	260	6	22	8	24	170	170	196.15	196.15	392.31
265	270	6	23	10	27	180	180	200.00	200.00	400.00
260	268	5	20	11	27	160	170	179.10	190.30	369.40
200	210	5	19	7	19	150	130	214.29	185.71	400.00
290	305	9	28	10	31	200	220	196.72	216.39	413.11
270	298	7	29	8	27	230	200	231.54	201.34	432.89
310	320	10	28	13	33	190	210	178.13	196.88	375.00
310	320	7	29	11	32	230	220	215.625	206.25	421.88
							Mean	**201.23**	**209.48**	**410.72**
									Var	586.490838
									Varmn	29.3245419
									SEmn	5.41521393
									t	2.09302405
									PRP%	2.7596136

Calibration V5 WOT (Left Brassine, Right Chitemamuswe)

Height a.g.l.		LEFT		RIGHT		WIDTH		WIDTH CORRECTED		TOTAL WIDTH
Pressure	Laser	in	out	in	out	Left	Right	Left	Right	
350	362	8	29	12	34	220	230	182.32	190.61	372.93
305	319	8	29	12	33	220	220	206.90	206.90	413.79
300	310	7	24	13	32	180	200	174.19	193.55	367.74
305	312	8	27	8	29	200	220	192.31	211.54	403.85
280	268	6	23	9	26	180	180	201.49	201.49	402.99
290	283	7	24	7	28	180	220	190.81	233.22	424.03
300	300	8	26	10	31	190	220	190.00	220.00	410.00
300	295	8	26	10	31	190	220	193.22	223.73	416.95
290	285	8	27	9	27	200	190	210.53	200.00	410.53
230	235	6	19	11	25	140	150	178.72	191.49	370.21
260	255	6	19	10	27	140	180	164.71	211.76	376.47
300	307	8	29	9	30	220	220	214.98	214.98	429.97
175	186	4	15	7	20	120	140	193.55	225.81	419.35
							Mean	**191.83**	**209.62**	**401.45**
									Var	479.102057
									Varmn	36.8540044
									SEmn	6.0707499
									t	2.09302405
									PRP%	3.16511099

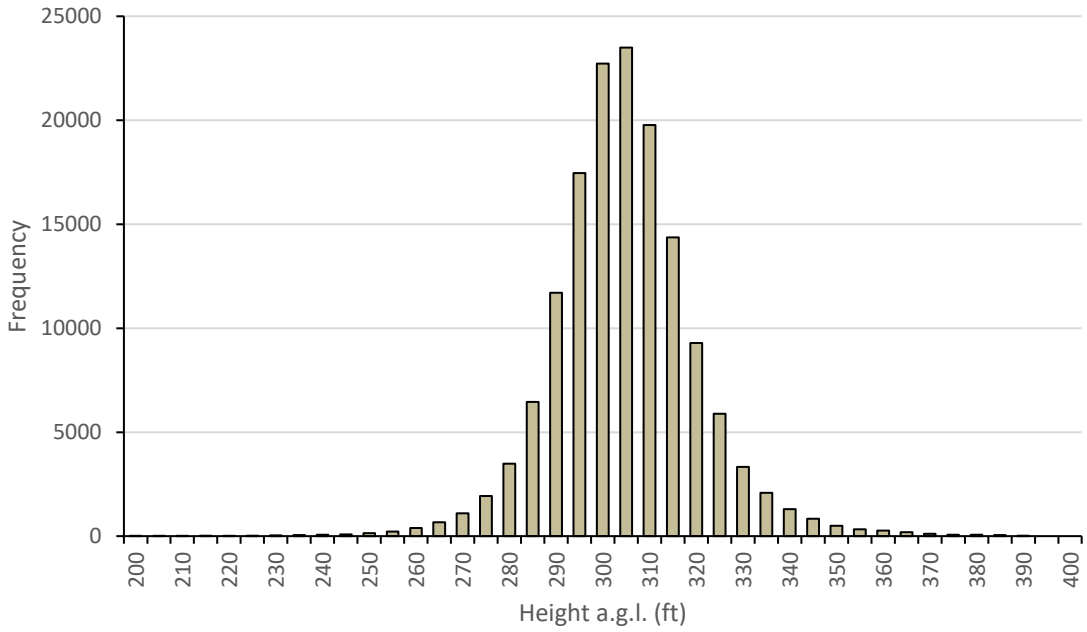

Team 1 Muroki (l), Chitemamuswe (r)
y = 1.42x - 14.307
Width Estimate
Height
0
50
100
150
200
250
300
350
400
450
500


Team 2 Brassine (l), Chitemamuswe (r)
y = 1.3414x + 0.0137
Width Estimate
Height
0
50
100
150
200
250
300
350
400
450
500

c. Maintenance of height

The target height was 300 feet above ground level (a.g.l.). Heights were calculated from individual heights recorded every second from the laser rangefinder. The mean height flown for the whole survey was 302.2 feet a.g.l. 95% of heights were within a predicted 30 feet of this value. The related statistics for the Zambezi survey are given in the table below and summarised in the following frequency histogram.

	HEIGHT ft a.g.l.
Mean	*302.2301*
Variance	*241.3997*
Std Deviation	*15.5370*



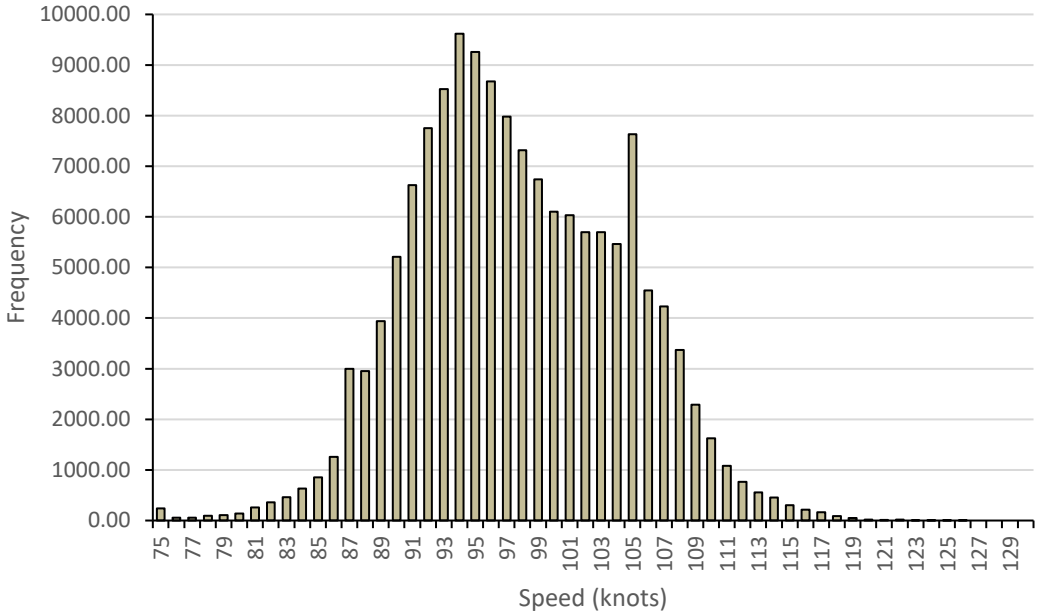
The true standard deviation in height must be less as there is variation due to instrument error that has not been allowed for.

d. **Flight speeds**

Flying speed was kept to below 103 knots (190km/hour). The mean speeds and related statistics are presented in the following table and frequency histogram.

.

	SPEED knots
Mean	*97.1766*
Variance	*44.6738*
Std Deviation	*6.6838*



The outlying peak of high speeds to the right were due to increasing the speed for the final strata in order to finish on time.

e. Comparison of observers

Muroki (L) & Chitemamuswe (R)	OBSERVED		EXPECTED	CHI SQ	Prob	
	LEFT	RIGHT				
baboon	1	1	1	0.0000	1.0000	
buffalo	32	40	36	0.4444	0.3458	
cattle	532	656	594	6.4714	0.0003	***
croc	12	21	16.5	1.2273	0.1172	
donkey	0	2	1	1.0000	0.1573	
duiker	17	40	28.5	4.6404	0.0023	**
eland	9	22	15.5	2.7258	0.0196	*
elephants	144	154	149	0.1678	0.5624	
elephant carcass1	2	3	2.5	0.1000	0.6547	
elephant carcass2	0	4	2	2.0000	0.0455	*
elephant carcass3	4	15	9.5	3.1842	0.0116	*
elephant carcass4	8	28	18	5.5556	0.0009	***
elephant carcasses	14	50	32	10.1250	6.80E-06	***
gemsbok	14	30	22	2.9091	0.0159	*
giraffe	14	25	19.5	1.5513	0.0782	
ground hornbill	0	1	0.5	0.5000	0.3173	
hartebeest	0	6	3	3.0000	0.0143	*
hippo	23	43	33	3.0303	0.0138	*
horse	1	4	2.5	0.9000	0.1797	
impala	14	28	21	2.3333	0.0308	*
kudu	10	55	32.5	15.5769	2.38E-08	***
lechwe	18	34	26	2.4615	0.0265	*
monkey	1	2	1.5	0.1667	0.5637	
ostrich	15	18	16.5	0.1364	0.6015	
pig	0	4	2	2.0000	0.0455	*
reedbuck	0	9	4.5	4.5000	0.0027	**
roan	4	29	16.5	9.4697	1.35E-05	***
sable	24	30	27	0.3333	0.4142	
shoats	29	44	36.5	1.5411	0.0792	
springbok	1	1	1	0.0000	1.0000	
steenbok	1	8	4.5	2.7222	0.0196	*
tsessebe	0	3	1.5	1.5000	0.0833	
warthog	16	34	25	3.2400	0.0109	*
waterbuck	6	4	5	0.2000	0.5271	
wildebeest	12	16	14	0.2857	0.4497	
zebra	52	81	66.5	3.1617	0.0119	*

Brassine (L) & Chitemamuswe (R)	OBSERVED		EXPECTED	CHI SQ	Prob	
	LEFT	RIGHT				
baboon	2	4	3	0.333333	0.4142	
buffalo	13	17	15	0.266667	0.4652	
cattle	112	140	126	1.555556	0.0778	
croc	6	23	14.5	4.982759	0.0016	**
duiker	3	19	11	5.818182	0.0006	***
eland	3	10	6.5	1.884615	0.0522	
elephants	82	110	96	2.041667	0.0433	*
elephant carcass1	0	0	0	0	1.0000	
elephant carcass2	1	2	1.5	0.166667	0.5637	
elephant carcass3	0	7	3.5	3.5	0.0082	**
elephant carcass4	12	31	21.5	4.197674	0.0038	**
gemsbok	4	10	7	1.285714	0.1088	
giraffe	23	21	22	0.045455	0.7630	
ground hornbill	1	0	0.5	0.5	0.3173	
hippo	16	43	29.5	6.177966	0.0004	***
horse	1	1	1	0	1.0000	
impala	17	28	22.5	1.344444	0.1011	
kudu	26	41	33.5	1.679104	0.0669	
lechwe	33	49	41	1.560976	0.0772	
monkey	1	0	0.5	0.5	0.3173	
ostrich	1	10	5.5	3.681818	0.0067	**
reedbuck	11	3	7	2.285714	0.0325	*
roan	6	24	15	5.4	0.0010	**
sable	33	49	41	1.560976	0.0772	
shoats	7	10	8.5	0.264706	0.4669	
springbok	1	0	0.5	0.5	0.3173	
steenbok	3	4	3.5	0.071429	0.7055	
tsessebe	1	1	1	0	1.0000	
warthog	20	38	29	2.793103	0.0181	*
waterbuck	1	2	1.5	0.166667	0.5637	
wildebeest	8	6	7	0.142857	0.5930	
zebra	46	66	56	1.785714	0.0588	

APPENDIX III: RESULTS BY STRATUM

a. Estimates of numbers, densities and confidence limits

The following tables give the results for each stratum based on the numbers seen in the sample. SI refers to the sampling intensity for the stratum. Results for all species and attributes counted are given. Column 6, labelled PRP (Percent Relative Precision), is the 95% confidence interval expressed as a percentage of the estimate.

"No. in" is the number of animals seen between the sampling strips. "No. out" is the number seen outside of them. Where the calculated lower limit of the confidence range is less than the number actually seen in the stratum (including all sightings, both in and out), the number seen is given as the lower limit of the range.

For species or attributes where no meaningful estimate can be given, only number seen is reported.

The individual stratum results and their combinations give higher level results as reported above are given. Where the overall result for a stratum is the result of separate coverages, the overall result follows the component coverages.

Zambezi Region Overall Area: 17380 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	12008	3045	3882	1742488	21.6	9410 - 14606	69.09
ElephantFamily	10862	2719	3476	1717081	23.7	8283 - 13440	62.5
ElephantBull	1146	326	406	22826.8	25.9	849 - 1443	6.59
EleCarcass 1	5	1	0	19.1	182.4	1 - 13	0.03
EleCarcass 2	26	5	1	141.6	89.6	5 - 50	0.15
EleCarcass 3	141	26	1	965.7	43.5	79 - 202	0.81
EleCarcass 4	347	74	3	2379.7	27.6	251 - 443	2
All E carcasses	519	106	5	3791.7	23.4	398 - 640	2.98
Baboon	189	42	25	4408.7	69.2	58 - 319	1.09
Buffalo	7538	1802	2683	3522803	49.0	3844 - 11231	43.37
Duiker	311	48	0	3325.9	36.5	197 - 424	1.79
Eland	431	96	15	17950.4	61.2	167 - 694	2.48
Giraffe	403	99	42	10219.3	49.4	204 - 602	2.32
Hippopotamus	2435	629	65	243457	39.9	1464 - 3406	14.01
Impala	3486	874	153	444327	37.6	2175 - 4798	20.06
Kudu	995	261	21	24755.3	31.1	686 - 1305	5.73
Lechwe	4931	1291	197	802638.1	35.8	3168 - 6694	28.37
Monkey	36	14	0	279.5	92.0	14 - 69	0.21
Reedbuck	275	58	0	5563.1	53.4	128 - 421	1.58
Roan	325	84	8	6037.2	47.1	172 - 477	1.87
Sable	2137	576	230	114723.6	31.2	1470 - 2803	12.29
Steenbok	65	10	0	449.3	64.3	23 - 107	0.37
Tsessebe	108	23	1	3043	100.1	23 - 217	0.62
Warthog	1135	276	7	39997.3	34.7	742 - 1529	6.53
Waterbuck	171	45	28	3197.6	64.9	60 - 283	0.99
Wildebeest	1483	449	154	291020	71.6	449 - 2545	8.53
Zebra	10767	2844	2865	4697552	39.6	6501 - 15032	61.95
Hyaena		4					
Jackal BB		4					
Lion		2					
Crocodile	403	126	7	4055.8	31.1	277 - 528	2.32
GroundHornbill	31	4	0	733.7	172.1	4 - 84	0.18
Ostrich	90	20	17	1213	76.1	22 - 159	0.52
Pig	133	45	0	5317.7	108.2	45 - 276	0.76
Horse	32	4	0	737.3	167.6	4 - 85	0.18
Cattle	135878	30404	16556	6.82E+07	12.0	119628 - 152127	781.8
Sheep/goats	6838	1114	56	1008382	28.9	4862 - 8815	39.35
OtherCarcass 1	22	7	0	76.9	78.3	7 - 39	0.13
OtherCarcass 2	80	18	0	538.2	57.3	34 - 125	0.46
OtherCarcass 3	46	12	0	178.6	56.8	20 - 73	0.27
OtherCarcass 4	191	47	1	868.5	30.3	133 - 249	1.1
Logging	81	9	0	1057.2	79.4	17 - 145	0.46

BUFA : Mahango + Buffalo A Area: 1162 km² Sampling Intensity: 10.78983%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
ElephantFamily	4810	519	570	2304214	74.6	1221 - 8399	413.95
ElephantBull	602	65	75	50198.1	87.9	73 - 1132	51.84
EleCarcass 2	9	1	0	67.2	209.1	1 - 29	0.8
EleCarcass 4	9	1	0	68.7	211.5	1 - 29	0.8
All E carcasses	19	2	0	96.6	125.4	2 - 42	1.6
Buffalo	3698	399	82	1066701	66.0	1256 - 6140	318.24
Duiker	46	5	0	102.5	51.7	22 - 70	3.99
Eland	232	25	0	39195.1	202.0	25 - 700	19.94
Giraffe	19	2	0	103.9	130.1	2 - 43	1.6
Hippopotamus	213	23	0	7568.6	96.5	23 - 419	18.34
Kudu	195	21	0	4772	83.9	31 - 358	16.75
Lechwe	389	42	0	100539	192.6	42 - 1139	33.5
Reedbuck	46	5	0	1718.1	211.5	5 - 144	3.99
Roan	74	8	4	1275.5	113.9	8 - 159	6.38
Sable	1094	118	17	279088.7	114.2	118 - 2343	94.12
Tsessebe	65	7	0	3470.1	214.7	7 - 204	5.58
Warthog	120	13	0	3446.1	115.2	13 - 259	10.37
Waterbuck	102	11	0	6505.2	187.1	11 - 293	8.77
Wildebeest	278	30	0	60446.8	209.1	30 - 859	23.93
Zebra	65	7	0	1309.7	131.9	7 - 150	5.58
Hyaena		1					
Crocodile	306	33	0	5919.4	59.5	124 - 488	26.32
Ostrich	9	1	2	82.8	232.2	1 - 31	0.8
Sheep/goats	880	95	0	738338.8	230.8	95 - 2912	75.77
OtherCarcass 1	9	1	0	68.7	211.5	1 - 29	0.8
OtherCarcass 2	9	1	0	68.7	211.5	1 - 29	0.8
OtherCarcass 3	9	1	0	84.6	234.7	1 - 31	0.8
OtherCarcass 4	37	4	0	219.7	94.5	4 - 72	3.19

BUFB : Mahango + Buffalo B Area: 1162 km² Sampling Intensity: 10.34062 %

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	3926	406	439	1849003	79.9	791 - 7062	337.89
ElephantFamily	3278	339	349	1761138	93.3	339 - 6339	282.13
ElephantBull	648	67	90	67808.5	92.7	67 - 1248	55.76
EleCarcass 2	10	1	0	86.7	222.0	1 - 31	0.83
EleCarcass 3	29	3	0	166.6	102.6	3 - 59	2.5
All E carcasses	39	4	0	191.6	82.5	7 - 71	3.33
Buffalo	4506	466	406	3990797	102.2	466 - 9113	387.82
Duiker	19	2	0	131	136.4	2 - 46	1.66
Eland	106	11	3	10164.6	218.6	11 - 339	9.15
Giraffe	39	4	0	732.9	161.4	4 - 101	3.33
Hippopotamus	300	31	0	29019.8	131.0	31 - 693	25.8
Impala	367	38	0	59286	152.8	38 - 929	31.63
Kudu	367	38	1	11197.6	66.4	123 - 612	31.63
Lechwe	1064	110	0	206221.2	98.4	110 - 2111	91.55
Roan	116	12	0	2991.8	108.7	12 - 242	9.99
Sable	387	40	12	15473.3	74.2	100 - 674	33.29
Steenbok	19	2	0	121.5	131.4	2 - 45	1.66
Warthog	319	33	0	31512.2	128.3	33 - 728	27.46
Zebra	213	22	0	10881	113.1	22 - 453	18.31
Crocodile	135	14	0	4227.5	110.7	14 - 285	11.65
Ostrich	48	5	1	1425.6	180.1	5 - 135	4.16
Cattle	484	50	29	102749.7	152.9	50 - 1223	41.61
OtherCarcass 3	29	3	0	129.4	90.4	3 - 55	2.5
OtherCarcass 4	29	3	0	214.7	116.5	3 - 63	2.5

BUFC : Mahango + Buffalo C Area: 1162 km² Sampling Intensity: 9.766%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	2918	285	680	1010998	81.5	541 - 5296	251.13
ElephantFamily	2550	249	643	988778.4	92.2	249 - 4901	219.41
ElephantBull	369	36	37	5565.9	47.9	192 - 545	31.72
EleCarcass 3	10	1	0	100.6	231.6	1 - 34	0.88
EleCarcass 4	31	3	0	189.7	106.0	3 - 63	2.64
All E carcasses	41	4	0	223	86.2	6 - 76	3.52
Baboon	0	0	25	0	0	0 - 0	0
Buffalo	1904	186	455	712553	104.8	186 - 3901	163.9
Duiker	20	2	0	394.4	229.3	2 - 67	1.76
Eland	0	0	2	0	0	0 - 0	0
Giraffe	10	1	0	83.3	210.8	1 - 32	0.88
Hippopotamus	102	10	15	3459.5	135.8	10 - 241	8.81
Impala	102	10	0	8330.6	210.8	10 - 318	8.81
Kudu	614	60	10	52222.2	88.0	74 - 1155	52.87
Lechwe	1321	129	0	731577.8	153.1	129 - 3343	113.67
Roan	41	4	0	228	87.2	5 - 77	3.52
Sable	1075	105	128	110166.6	73.0	290 - 1860	92.52
Steenbok	10	1	0	83.3	210.8	1 - 32	0.88
Warthog	266	26	5	8024.9	79.6	54 - 478	22.91
Waterbuck	113	11	0	3829.9	129.9	11 - 259	9.69
Zebra	297	29	28	20093.1	112.9	29 - 632	25.55
Crocodile	205	20	0	9921.6	115	20 - 440	17.62
Ostrich	51	5	11	1549.2	181.8	5 - 144	4.41
Cattle	666	65	44	132764.5	129.5	65 - 1527	57.28
Sheep/goats	133	13	0	16665.4	229.3	13 - 438	11.46
OtherCarcass 1	10	1	0	80.8	207.5	1 - 31	0.88
OtherCarcass 2	20	2	0	323.1	207.5	2 - 63	1.76
OtherCarcass 4	20	2	0	323.1	207.5	2 - 63	1.76

Buffalo / Mahango Mean(BUFA,BUFB,BUFC) Area: 1162 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	4086	1275	1764	546666.9	37.5	2552 - 5619	351.6
ElephantFamily	3546	1107	1562	561570.1	43.8	1992 - 5100	305.16
ElephantBull	540	168	202	13730.3	45.0	297 - 783	46.44
EleCarcass 2	6	2	0	17.1	135.8	2 - 15	0.54
EleCarcass 3	13	4	0	29.7	86.4	4 - 24	1.13
EleCarcass 4	13	4	0	28.7	83.4	4 - 24	1.15
All E carcasses	33	10	0	56.8	47.8	17 - 48	2.82
Baboon	0	0	25	0	0	0 - 0	0
Buffalo	3370	1051	943	641116.8	49.3	1709 - 5030	289.99
Duiker	29	9	0	69.8	60.3	11 - 46	2.47
Eland	113	36	5	5484.4	136.3	36 - 266	9.7
Giraffe	22	7	0	102.2	93.3	7 - 43	1.94
Hippopotamus	205	64	15	4449.8	67.4	67 - 343	17.65
Impala	157	48	0	7513	114.8	48 - 336	13.48
Kudu	392	119	11	7576.9	46.0	212 - 573	33.75
Lechwe	925	281	0	115370.9	76.2	281 - 1629	79.57
Reedbuck	15	5	0	190.9	185.5	5 - 44	1.33
Roan	77	24	4	499.5	60.2	31 - 123	6.63
Sable	852	263	157	44969.8	51.6	412 - 1292	73.31
Steenbok	10	3	0	22.8	100.3	3 - 20	0.85
Tsessebe	22	7	0	385.6	188.3	7 - 62	1.86
Warthog	235	72	5	4775.9	60.9	92 - 379	20.25
Waterbuck	72	22	0	1148.3	98.3	22 - 142	6.16
Wildebeest	93	30	0	6716.3	183.4	30 - 263	7.98
Zebra	192	58	28	3587.1	64.9	67 - 316	16.48
Hyaena		1					
Crocodile	215	67	0	2229.8	45.5	117 - 313	18.53
Ostrich	36	11	14	339.7	105.4	11 - 74	3.12
Cattle	383	115	73	26168.2	87.6	115 - 719	32.96
Sheep/goats	338	108	0	83889.4	177.8	108 - 939	29.08
OtherCarcass 1	7	2	0	16.6	130	2 - 15	0.56
OtherCarcass 2	10	3	0	43.5	138	3 - 24	0.85
OtherCarcass 3	13	4	0	23.8	79.3	4 - 23	1.1
OtherCarcass 4	29	9	0	84.2	65.9	10 - 48	2.48

BAB :Babwata General Use Area Area: 3789 km² Sampling Intensity: 10.48499%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	95	10	20	8515.5	197.1	10 - 283	2.52
ElephantFamily	95	10	14	8515.5	197.1	10 - 283	2.52
ElephantBull	0	0	6	0	0	0 - 0	0
EleCarcass 3	10	1	1	80.9	192.1	1 - 28	0.25
EleCarcass 4	67	7	1	445.2	64.4	24 - 110	1.76
All E carcasses	76	8	2	484	58.7	31 - 121	2.01
Duiker	153	16	0	2446.4	66	52 - 253	4.03
Eland	114	12	0	3131.6	99.6	12 - 228	3.02
Giraffe	0	0	4	0	0	0 - 0	0
Kudu	143	15	1	8316.8	129.8	15 - 329	3.78
Sable	19	2	0	333.6	195	2 - 56	0.5
Steenbok	29	3	0	237.1	109.6	3 - 60	0.76
Tsessebe	48	5	0	2023.7	192.2	5 - 139	1.26
Warthog	48	5	0	2024.9	192.2	5 - 139	1.26
Zebra	29	3	0	728.4	192.1	3 - 84	0.76
Ostrich	38	4	0	792	150.3	4 - 95	1.01
Horse	29	3	0	728.5	192.1	3 - 84	0.76
Cattle	1679	176	47	1123408	128.6	176 - 3838	44.3
Sheep/goats	315	33	0	39462.9	128.6	33 - 719	8.31
OtherCarcass 3	10	1	0	80.9	192.1	1 - 28	0.25
OtherCarcass 4	29	3	0	224.6	106.7	3 - 59	0.76

SUSA : Kwando Core Area A Area: 1134 km² Sampling Intensity: 9.97%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	1856	185	422	711587	104.8	185 - 3801	163.63
ElephantFamily	1474	147	399	564579.8	117.5	147 - 3207	130.02
ElephantBull	381	38	23	18005.5	81.2	72 - 691	33.61
EleCarcass 3	10	1	0	90.4	218.6	1 - 32	0.88
EleCarcass 4	130	13	0	1334	64.6	46 - 215	11.5
All E carcasses	140	14	0	1510.5	63.8	51 - 230	12.38
Buffalo	231	23	19	26809.8	163.7	23 - 608	20.34
Duiker	50	5	0	402.7	92.3	5 - 96	4.42
Eland	100	10	1	7180.1	194.8	10 - 296	8.84
Giraffe	251	25	26	7863.3	81.5	46 - 455	22.11
Hippopotamus	1083	108	6	198516.3	94.8	108 - 2111	95.52
Impala	963	96	9	79485.4	67.5	313 - 1613	84.91
Kudu	341	34	9	4766.9	46.7	182 - 500	30.07
Lechwe	2808	280	107	842120.2	75.4	692 - 4925	247.66
Reedbuck	191	19	0	8302.3	110.3	19 - 401	16.81
Roan	201	20	0	11704.1	124.4	20 - 450	17.69
Sable	1103	110	27	55741.5	49.3	559 - 1648	97.29
Steenbok	10	1	0	90.2	218.4	1 - 32	0.88
Tsessebe	20	2	0	352.7	215.9	2 - 63	1.77
Warthog	221	22	0	5091.8	74.6	56 - 385	19.46
Wildebeest	90	9	4	7286.7	218.1	9 - 287	7.96
Zebra	933	93	44	186810.9	106.9	93 - 1929	82.26
Jackal BB		1					
Lion		2					
Crocodile	160	16	0	4599.9	97.5	16 - 317	14.15
Ostrich	30	3	2	813.4	218.6	3 - 96	2.65
Cattle	0	0	13	0	0	0 - 0	0
OtherCarcass 2	20	2	0	351.9	215.7	2 - 63	1.77
OtherCarcass 3	20	2	0	148	139.8	2 - 48	1.77
OtherCarcass 4	70	7	1	295.8	56.5	31 - 110	6.19

SUSAR : Kwando Core Area Area: 1134 km² Sampling Intensity: 10.125%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	1491	151	160	202859	69.6	453 - 2530	131.52
ElephantFamily	1284	130	119	106919.8	58.7	530 - 2038	113.23
ElephantBull	207	21	41	28254.5	186.9	21 - 595	18.29
EleCarcass 4	69	7	0	664.8	86.0	10 - 129	6.1
All E carcasses	69	7	0	664.8	86.0	10 - 129	6.1
Baboon	89	9	0	5349.8	189.7	9 - 258	7.84
Buffalo	257	26	0	12940.2	102.1	26 - 519	22.65
Duiker	30	3	0	378.4	151.4	3 - 74	2.61
Eland	40	4	0	1400.6	218.4	4 - 126	3.48
Giraffe	69	7	3	1733.6	138.9	7 - 165	6.1
Hippopotamus	563	57	2	86871.9	120.7	57 - 1243	49.65
Impala	869	88	0	91317.4	80.2	172 - 1566	76.65
Kudu	267	27	0	32763.6	156.5	27 - 684	23.52
Lechwe	1037	105	0	38351.2	43.5	585 - 1489	91.45
Roan	20	2	2	415.2	237.9	2 - 67	1.74
Sable	257	26	3	10726.4	93.0	26 - 496	22.65
Tsessebe	40	4	1	1366	215.7	4 - 125	3.48
Warthog	138	14	0	2292	79.8	28 - 249	12.19
Waterbuck	10	1	0	86.4	217	1 - 31	0.87
Zebra	286	29	9	16302.7	102.8	29 - 581	25.26
Crocodile	49	5	0	794.7	131.6	5 - 114	4.35
Cattle	2015	204	4	367384.3	69.4	617 - 3413	177.68
OtherCarcass 2	10	1	0	87.4	218.2	1 - 31	0.87
OtherCarcass 4	40	4	0	525.1	133.8	4 - 92	3.48

SusA Mean (SUSA,SUSAR) Area: 1134 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	1673	336	582	228611.5	60.6	660 - 2687	147.57
ElephantFamily	1379	277	518	167874.9	63.0	511 - 2248	121.62
ElephantBull	294	59	64	11565	77.5	66 - 522	25.95
EleCarcass 3	5	1	0	22.6	200.9	1 - 15	0.44
EleCarcass 4	100	20	0	499.7	47.5	52 - 147	8.8
All E carcasses	105	21	0	543.8	47.2	55 - 154	9.24
Baboon	44	9	0	1337.5	174.4	9 - 122	3.92
Buffalo	244	49	19	9937.5	86.7	49 - 455	21.49
Duiker	40	8	0	195.3	74.3	10 - 70	3.52
Eland	70	14	1	2145.2	140.5	14 - 168	6.16
Giraffe	160	32	29	2399.2	64.9	56 - 264	14.1
Hippopotamus	823	165	8	71347.1	68.8	257 - 1389	72.58
Impala	916	184	9	42700.7	47.8	478 - 1354	80.78
Kudu	304	61	9	9382.6	67.6	99 - 509	26.79
Lechwe	1923	385	107	220117.8	51.7	928 - 2917	169.55
Reedbuck	95	19	0	2075.6	101.4	19 - 192	8.4
Roan	110	22	2	3029.8	105.9	22 - 227	9.72
Sable	680	136	30	16617	40.2	407 - 953	59.97
Steenbok	5	1	0	22.6	200.8	1 - 15	0.44
Tsessebe	30	6	1	429.7	147.5	6 - 74	2.63
Warthog	179	36	0	1845.9	50.7	88 - 271	15.83
Waterbuck	5	1	0	21.6	199.5	1 - 15	0.44
Wildebeest	45	9	4	1821.7	200.5	9 - 136	3.98
Zebra	610	122	53	50778.4	78.4	132 - 1087	53.76
Jackal BB		1					
Lion		2					
Crocodile	105	21	0	1348.6	74.2	27 - 183	9.25
Ostrich	15	3	2	203.4	200.9	3 - 45	1.33
Cattle	1007	204	17	91846.1	63.8	365 - 1650	88.84
OtherCarcass 2	15	3	0	109.8	148.4	3 - 37	1.32
OtherCarcass 3	10	2	0	37	128.6	2 - 23	0.88
OtherCarcass 4	55	11	1	205.2	55.4	24 - 85	4.84

SUSC : Kwando Core Area C Area: 1134 km² Sampling Intensity: 10.322%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	3371	348	318	1591521	86.3	462 - 6280	297.29
ElephantFamily	3294	340	304	1581282	88.0	394 - 6194	290.46
ElephantBull	78	8	14	817.8	85.1	12 - 143	6.83
EleCarcass 3	29	3	0	355.3	149.6	3 - 73	2.56
EleCarcass 4	48	5	0	373.8	92.0	5 - 93	4.27
All E carcasses	78	8	0	548.1	69.7	24 - 131	6.83
Baboon	116	12	0	5244.7	143.7	12 - 283	10.25
Buffalo	78	8	6	2981.9	162.5	8 - 203	6.83
Duiker	29	3	0	443	167.0	3 - 78	2.56
Eland	184	19	9	23501.6	192.1	19 - 538	16.23
Giraffe	339	35	8	30456.8	118.7	35 - 742	29.9
Hippopotamus	698	72	1	60813.2	81.5	129 - 1266	61.51
Impala	901	93	0	144059.1	97.1	93 - 1776	79.45
Kudu	97	10	0	1116.9	79.6	20 - 174	8.54
Lechwe	2945	304	65	544569.6	57.8	1243 - 4647	259.7
Roan	87	9	0	2900.1	142.4	9 - 211	7.69
Sable	998	103	25	85536	67.6	323 - 1672	87.99
Steenbok	10	1	0	84.5	218.8	1 - 31	0.85
Tsessebe	48	5	0	2105.1	218.4	5 - 154	4.27
Warthog	194	20	0	2183.6	55.6	86 - 302	17.09
Waterbuck	48	5	0	2067	216.4	5 - 153	4.27
Wildebeest	68	7	0	2130.2	156.9	7 - 174	5.98
Zebra	853	88	15	106423	88.2	100 - 1605	75.18
Crocodile	78	8	0	386.1	58.5	32 - 123	6.83
Ostrich	10	1	0	82.7	216.4	1 - 31	0.85
Cattle	775	80	3	131991.6	108.1	80 - 1613	68.34
OtherCarcass 3	19	2	0	145.7	143.7	2 - 47	1.71
OtherCarcass 4	39	4	0	192.1	82.5	7 - 71	3.42

Kwando Core Area Mean (SUSA(Mn),SUSC) Area: 1134 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	2522	684	900	455033.1	55.2	1130 - 3915	222.43
ElephantFamily	2336	617	822	437289.2	58.4	972 - 3701	206.04
ElephantBull	186	67	78	3095.7	61.8	71 - 301	16.39
EleCarcass 3	17	4	0	94.5	117.7	4 - 37	1.5
EleCarcass 4	74	25	0	218.4	41.2	44 - 105	6.53
All E carcasses	91	29	0	273	37.4	57 - 125	8.04
Baboon	80	21	0	1645.5	104.2	21 - 164	7.09
Buffalo	161	57	25	3229.8	73.0	57 - 278	14.16
Duiker	34	11	0	159.6	75.6	11 - 61	3.04
Eland	127	33	10	6411.7	130.1	33 - 292	11.2
Giraffe	250	67	37	8214	75.0	67 - 437	22
Hippopotamus	760	237	9	33040.1	49.3	385 - 1135	67.05
Impala	908	277	9	46689.9	49.1	463 - 1354	80.11
Kudu	200	71	9	2624.9	52.8	95 - 306	17.67
Lechwe	2434	689	172	191171.9	37.1	1531 - 3336	214.63
Reedbuck	48	19	0	518.9	98.7	19 - 95	4.2
Roan	99	31	2	1482.5	80.5	31 - 178	8.7
Sable	839	239	55	25538.3	39.3	509 - 1169	73.98
Steenbok	7	2	0	26.8	145.3	2 - 18	0.65
Tsessebe	39	11	1	633.7	132.8	11 - 91	3.45
Warthog	187	56	0	1007.4	35.1	121 - 252	16.46
Waterbuck	27	6	0	522.2	176.7	6 - 74	2.35
Wildebeest	56	16	4	988	114.9	16 - 121	4.98
Zebra	731	210	68	39300.4	56.0	322 - 1140	64.47
Jackal BB		1					
Lion		2					
Crocodile	91	29	0	433.7	47.1	48 - 134	8.04
Ostrich	12	4	2	71.5	141.1	4 - 30	1.09
Cattle	891	284	20	55959.4	54.8	403 - 1379	78.59
OtherCarcass 2	7	3	0	27.5	144.5	3 - 18	0.66
OtherCarcass 3	15	4	0	45.7	94.9	4 - 29	1.3
OtherCarcass 4	47	15	1	99.3	44.0	26 - 67	4.13

KWA : Kwando A Area: 1513 km² Sampling Intensity: 10.615 %

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	2581	274	359	309159.5	46.5	1380 - 3782	170.6
ElephantFamily	2054	218	275	214843.7	48.8	1052 - 3055	135.74
ElephantBull	528	56	84	17851.7	54.7	239 - 816	34.87
EleCarcass 1	9	1	0	76.3	200.3	1 - 28	0.62
EleCarcass 3	57	6	0	853.4	111.7	6 - 120	3.74
EleCarcass 4	66	7	0	347.8	61.1	26 - 106	4.36
All E carcasses	132	14	0	622.3	40.9	78 - 186	8.72
Buffalo	1244	132	392	1082484	180.8	132 - 3491	82.19
Duiker	19	2	0	141	136.2	2 - 44	1.25
Eland	19	2	0	308.8	201.5	2 - 57	1.25
Giraffe	57	6	0	1398.3	142.9	6 - 137	3.74
Hippopotamus	980	104	10	217250.4	102.8	104 - 1987	64.75
Impala	1837	195	7	593983.2	90.6	195 - 3502	121.41
Kudu	170	18	0	8261.3	115.8	18 - 366	11.21
Lechwe	584	62	7	74448.6	100.9	62 - 1174	38.6
Reedbuck	57	6	0	3027.1	210.3	6 - 175	3.74
Roan	19	2	0	308.8	201.5	2 - 57	1.25
Sable	254	27	0	41921.2	173.9	27 - 697	16.81
Warthog	433	46	0	37190.5	96.1	46 - 850	28.64
Waterbuck	132	14	7	5926.4	126.1	14 - 298	8.72
Wildebeest	386	41	7	97474.1	174.6	41 - 1061	25.53
Zebra	933	99	9	342564.8	135.6	99 - 2197	61.64
Crocodile	28	3	3	804	216.8	3 - 90	1.87
Cattle	6783	720	84	6480908	81.1	1283 - 12283	448.3
Sheep/goats	499	53	0	99243.4	136.3	53 - 1180	33
OtherCarcass 2	19	2	0	326.5	207.2	2 - 58	1.25
OtherCarcass 3	9	1	0	74.5	197.9	1 - 28	0.62
OtherCarcass 4	38	4	0	795.4	161.7	4 - 99	2.49

KWB : Kwando B Area: 1513 km² Sampling Intensity: 9.681%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	4328	419	410	1494678	61.5	1664 - 6992	286.04
ElephantFamily	4132	400	381	1513015	64.9	1452 - 6812	273.07
ElephantBull	196	19	29	4064.5	70.8	57 - 335	12.97
EleCarcass 2	21	2	0	171.5	138.1	2 - 49	1.37
EleCarcass 3	10	1	0	101	212	1 - 32	0.68
EleCarcass 4	124	12	2	1969.1	78.0	27 - 221	8.19
All E carcasses	155	15	2	2182.8	65.7	53 - 257	10.24
Baboon	217	21	0	11052.6	105.6	21 - 446	14.34
Buffalo	1746	169	115	2593080	201.0	169 - 5254	115.37
Duiker	21	2	0	163.9	135.0	2 - 49	1.37
Eland	134	13	0	11382.3	173.1	13 - 367	8.87
Giraffe	62	6	0	1374.6	130.3	6 - 143	4.1
Hippopotamus	1415	137	20	575818.5	116.8	137 - 3068	93.53
Impala	2179	211	57	859293.4	92.7	211 - 4199	144.05
Kudu	279	27	0	15600.9	97.6	27 - 551	18.43
Lechwe	2469	239	18	1905209	121.8	239 - 5476	163.16
Monkey	10	1	0	94.9	205.4	1 - 32	0.68
Reedbuck	134	13	0	5924.8	124.9	13 - 302	8.87
Roan	279	27	2	15912.1	98.6	27 - 554	18.43
Sable	186	18	18	14569.2	141.5	18 - 449	12.29
Warthog	640	62	2	79531.9	95.9	62 - 1255	42.33
Waterbuck	0	0	21	0	0	0 - 0	0
Wildebeest	145	14	13	11182.2	159.3	14 - 375	9.56
Zebra	981	95	50	135439.2	81.7	179 - 1783	64.85
Hyaena		2					
Jackal BB		1					
Crocodile	62	6	0	3728.1	214.7	6 - 195	4.1
Cattle	4896	474	126	4286698	92.1	474 - 9407	323.59
Sheep/goats	248	24	0	36340.3	167.5	24 - 663	16.38
OtherCarcass 1	10	1	0	99.3	210.2	1 - 32	0.68
OtherCarcass 2	52	5	0	822.4	121.0	5 - 114	3.41
OtherCarcass 4	83	8	0	564.8	62.7	31 - 134	5.46
Logging	10	1	0	94.9	205.4	1 - 32	0.68

Kwando Mean (KWA,KWB) Area: 1513 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	3455	693	769	450959.4	40.0	2072 - 4838	228.32
ElephantFamily	3093	618	656	431964.7	43.8	1739 - 4446	204.4
ElephantBull	362	75	113	5479	42.1	209 - 514	23.92
EleCarcass 1	5	1	0	19.1	190.9	1 - 14	0.31
EleCarcass 2	10	2	0	42.9	130.6	2 - 24	0.68
EleCarcass 3	33	7	0	238.6	95.2	7 - 65	2.21
EleCarcass 4	95	19	2	579.2	52.2	45 - 145	6.28
All E carcasses	143	29	2	701.3	38.0	89 - 198	9.48
Baboon	108	21	0	2763.2	99.8	21 - 217	7.17
Buffalo	1495	301	507	918891	132.1	301 - 3469	98.78
Duiker	20	4	0	76.2	91.0	4 - 38	1.31
Eland	77	15	0	2922.8	145.4	15 - 188	5.06
Giraffe	59	12	0	693.2	91.5	12 - 113	3.92
Hippopotamus	1197	241	30	198267.2	76.6	280 - 2114	79.14
Impala	2008	406	64	363319.2	61.8	767 - 3250	132.73
Kudu	224	45	0	5965.6	70.9	65 - 383	14.82
Lechwe	1526	301	25	494914.4	94.9	301 - 2975	100.88
Monkey	5	1	0	23.7	194.2	1 - 15	0.34
Reedbuck	95	19	0	2238	102.1	19 - 193	6.31
Roan	149	29	2	4055.2	88.1	29 - 280	9.84
Sable	220	45	18	14122.6	111.2	45 - 465	14.55
Warthog	537	108	2	29180.6	65.5	185 - 889	35.48
Waterbuck	66	14	28	1481.6	120.2	14 - 145	4.36
Wildebeest	265	55	20	27164.1	127.9	55 - 605	17.54
Zebra	957	194	59	119501	74.4	245 - 1669	63.25
Hyaena		2					
Jackal BB		1					
Crocodile	45	9	3	1133	153.6	9 - 114	2.98
Cattle	5839	1194	210	2691902	57.9	2460 - 9218	385.95
Sheep/goats	374	77	0	33895.9	101.5	77 - 753	24.69
OtherCarcass 1	5	1	0	24.8	198.7	1 - 15	0.34
OtherCarcass 2	35	7	0	287.2	99.0	7 - 70	2.33
OtherCarcass 3	5	1	0	18.6	188.7	1 - 14	0.31
OtherCarcass 4	60	12	0	340.1	63.1	22 - 98	3.98
Logging	5	1	0	23.7	194.2	1 - 15	0.34

KWN : Kwando North Area: 666 km² Sampling Intensity: 11.499%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
Duiker	9	1	0	64.8	206.2	1 - 27	1.31
Giraffe	17	2	0	259	206.2	2 - 53	2.61
Reedbuck	17	2	0	131	146.6	2 - 43	2.61
Cattle	4748	546	0	1912015	64.9	1667 - 7829	712.93
Logging	9	1	0	78.3	226.7	1 - 28	1.31

Kwando Overall (Original MIKE site) (KWMn + KWN) Area: 2179 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	3455	693	769	450959.4	39.5	2091 - 4818	158.54
ElephantFamily	3093	618	656	431964.7	43.1	1758 - 4427	141.93
ElephantBull	362	75	113	5479	41.5	212 - 512	16.61
EleCarcass 1	5	1	0	19.1	188.2	1 - 14	0.22
EleCarcass 2	10	2	0	42.9	128.7	2 - 24	0.47
EleCarcass 3	33	7	0	238.6	93.8	7 - 65	1.53
EleCarcass 4	95	19	2	579.2	51.5	46 - 144	4.36
All E carcasses	143	29	2	701.3	37.5	90 - 197	6.58
Baboon	108	21	0	2763.2	98.4	21 - 215	4.98
Buffalo	1495	301	507	918891	130.2	301 - 3441	68.59
Duiker	28	5	0	141	84.7	5 - 53	1.31
Eland	77	15	0	2922.8	143.4	15 - 186	3.51
Giraffe	77	14	0	952.2	81.7	14 - 139	3.52
Hippopotamus	1197	241	30	198267.2	75.5	293 - 2101	54.95
Impala	2008	406	64	363319.2	60.9	785 - 3232	92.16
Kudu	224	45	0	5965.6	69.9	67 - 381	10.29
Lechwe	1526	301	25	494914.4	93.6	301 - 2955	70.05
Monkey	5	1	0	23.7	191.4	1 - 15	0.24
Reedbuck	113	21	0	2368.9	87.6	21 - 212	5.18
Roan	149	29	2	4055.2	86.8	29 - 278	6.83
Sable	220	45	18	14122.6	109.6	45 - 461	10.1
Warthog	537	108	2	29180.6	64.6	190 - 884	24.64
Waterbuck	66	14	28	1481.6	118.5	14 - 144	3.03
Wildebeest	265	55	20	27164.1	126.1	55 - 600	12.18
Zebra	957	194	59	119501	73.3	255 - 1659	43.92
Hyaena		2					
Jackal BB		1					
Crocodile	45	9	3	1133	151.5	9 - 113	2.07
Cattle	10587	1740	210	4603917	41.1	6232 - 14943	485.89
Sheep/goats	374	77	0	33895.9	100.0	77 - 747	17.15
OtherCarcass 1	5	1	0	24.8	195.8	1 - 15	0.24
OtherCarcass 2	35	7	0	287.2	97.6	7 - 70	1.62
OtherCarcass 3	5	1	0	18.6	186.0	1 - 13	0.22
OtherCarcass 4	60	12	0	340.1	62.2	23 - 98	2.76
Logging	14	2	0	102	147.9	2 - 34	0.64

ECN : East Zambesi North (West part) Area: 3984 km² Sampling Intensity: 10.491%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
EleCarcass 3	38	4	0	307.8	94.2	4 - 74	0.96
EleCarcass 4	19	2	0	162.8	137.1	2 - 45	0.48
All E carcasses	57	6	0	613	88.7	6 - 108	1.44
Duiker	38	4	0	278.6	89.7	4 - 72	0.96
Giraffe	29	3	0	760.3	197.5	3 - 85	0.72
Hippopotamus	38	4	11	1345	197.0	4 - 113	0.96
Sable	181	19	0	29219.3	193.3	19 - 531	4.55
Steenbok	10	1	0	82.6	195.3	1 - 28	0.24
Cattle	29330	3077	465	1.04E+07	22.5	22728 - 35933	736.2
Sheep/goats	2088	219	0	334629.5	56.8	903 - 3272	52.4
OtherCarcass 4	10	1	0	82.3	195.0	1 - 28	0.24
Logging	57	6	0	873	105.8	6 - 118	1.44

ECNE : East Zambesi North (East part) Area: 788 km² Sampling Intensity: 10.075%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
Hippopotamus	189	19	0	28170.6	192.3	19 - 551	23.93
Impala	10	1	0	84.8	200.4	1 - 30	1.26
Reedbuck	30	3	0	408.4	146.6	3 - 73	3.78
Warthog	50	5	0	2271.7	207.5	5 - 153	6.3
Zebra	2829	285	118	3660802	146.1	285 - 6962	359
Pig	169	17	0	27223.8	211.2	17 - 525	21.41
Cattle	26840	2704	888	1.37E+07	29.8	18830 - 34850	3406.09

RKNA : Rooikat North A Area: 788 km² Sampling Intensity: 10.128%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
Hippopotamus	39	4	0	497.6	121.1	4 - 87	5.01
Warthog	118	12	0	12724.8	204.2	12 - 360	15.04
Zebra	464	47	53	187016	199.9	47 - 1392	58.89
Crocodile	10	1	0	83.5	198.5	1 - 29	1.25
Ostrich	10	1	0	87.6	203.4	1 - 30	1.25
Cattle	24517	2483	1658	1.46E+07	33.4	16334 - 32700	3111.27
Sheep/goats	336	34	0	35440.7	120.3	34 - 739	42.6
OtherCarcass 4	10	1	0	83.5	198.5	1 - 29	1.25

RKNB : Rooikat North B Area: 788 km² Sampling Intensity: 10.697%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
EleCarcass 4	9	1	0	78.3	203.0	1 - 28	1.19
All E carcasses	9	1	0	78.3	203.0	1 - 28	1.19
Hippopotamus	37	4	0	1264.6	204.0	4 - 114	4.75
Wildebeest	514	55	4	236889.9	203.0	55 - 1558	65.25
Zebra	944	101	79	369127.6	138.0	101 - 2247	119.82
Pig	131	14	0	16249.3	208.9	14 - 404	16.61
Cattle	26530	2838	1970	1.19E+07	27.8	19146 - 33914	3366.78
Sheep/goats	224	24	0	15074.9	117.4	24 - 488	28.47
OtherCarcass 1	9	1	0	80.1	205.3	1 - 29	1.19

Rooikat North Mean (ECNE, RKNA,RKNB) Area: 788 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
EleCarcass 4	3	1	0	8.7	191.2	1 - 9	0.4
All E carcasses	3	1	0	8.7	191.2	1 - 9	0.4
Hippopotamus	88	27	0	3325.9	131.6	27 - 205	11.23
Impala	3	1	0	9.4	187.3	1 - 10	0.42
Reedbuck	10	3	0	45.4	137.1	3 - 24	1.26
Warthog	56	17	0	1666.3	147.1	17 - 138	7.11
Wildebeest	171	55	4	26321.1	191.2	55 - 499	21.75
Zebra	1412	433	250	468549.5	97.9	433 - 2795	179.24
Crocodile	3	1	0	9.3	186.9	1 - 9	0.42
Ostrich	3	1	0	9.7	191.5	1 - 10	0.42
Pig	100	31	0	4830.4	140.5	31 - 240	12.67
Cattle	25962	8025	4516	4461702	16.4	21697 - 30228	3294.71
Sheep/goats	187	58	0	5612.8	81.0	58 - 338	23.69
OtherCarcass 1	3	1	0	8.9	193.3	1 - 9	0.4
OtherCarcass 4	3	1	0	9.3	186.9	1 - 9	0.42

East Zambezi North (ECNW + RKN) Area: 4772 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
EleCarcass 3	38	4	0	307.8	91.8	4 - 73	0.8
EleCarcass 4	22	3	0	171.5	117.8	3 - 48	0.46
All E carcasses	60	7	0	621.7	82.5	11 - 110	1.26
Duiker	38	4	0	278.6	87.3	5 - 71	0.8
Giraffe	29	3	0	760.3	192.4	3 - 84	0.6
Hippopotamus	127	31	11	4670.9	107.7	31 - 263	2.65
Impala	3	1	0	9.4	185.1	1 - 9	0.07
Reedbuck	10	3	0	45.4	135.4	3 - 23	0.21
Sable	181	19	0	29219.3	188.3	19 - 522	3.8
Steenbok	10	1	0	82.6	190.2	1 - 28	0.2
Warthog	56	17	0	1666.3	145.3	17 - 137	1.17
Wildebeest	171	55	4	26321.1	188.8	55 - 495	3.59
Zebra	1412	433	250	468549.5	96.7	433 - 2778	29.6
Crocodile	3	1	0	9.3	184.6	1 - 9	0.07
Ostrich	3	1	0	9.7	189.1	1 - 10	0.07
Pig	100	31	0	4830.4	138.8	31 - 239	2.09
Cattle	55292	11102	4981	1.49E+07	13.9	47605 - 62980	1158.69
Sheep/goats	2274	277	0	340242.3	51.2	1111 - 3438	47.66
OtherCarcass 1	3	1	0	8.9	191.0	1 - 9	0.07
OtherCarcass 4	13	2	0	91.6	148.9	2 - 32	0.27
Logging	57	6	0	873	103.1	6 - 116	1.2

ECS : East Zambesi South - W part Area: 2381 km² Sampling Intensity: 10.523%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	1197	126	238	213782.1	79.5	245 - 2150	50.27
ElephantFamily	1169	123	237	210972.9	80.9	223 - 2115	49.1
ElephantBull	29	3	1	388.1	142.3	3 - 69	1.22
EleCarcass 2	10	1	0	81.6	195.8	1 - 28	0.42
EleCarcass 3	19	2	0	160	137.1	2 - 45	0.8
EleCarcass 4	48	5	0	862.5	127.3	5 - 108	2.02
All E carcasses	76	8	0	1529.9	106.0	8 - 157	3.19
Buffalo	2119	223	90	1888343	133.5	223 - 4949	89
Duiker	29	3	0	230.5	109.7	3 - 60	1.22
Reedbuck	86	9	0	2430	118.7	9 - 187	3.61
Steenbok	10	1	0	80	193.9	1 - 28	0.42
Warthog	29	3	0	734.4	195.8	3 - 84	1.22
Zebra	3146	331	296	3385525	120.5	331 - 6935	132.13
GroundHornbill	29	3	0	728.3	195.0	3 - 84	1.22
Cattle	32377	3407	1605	3.67E+07	38.5	19902 - 44853	1359.81
Sheep/goats	2509	264	38	449431.6	55.0	1128 - 3890	105.38
OtherCarcass 2	19	2	0	159.3	136.8	2 - 45	0.8
Logging	10	1	0	82.2	196.5	1 - 28	0.42

ECSE : East Zambesi South - E part Area: 718 km² Sampling Intensity: 10.523%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	437	46	4	171233.4	195.0	46 - 1289	60.86
ElephantFamily	437	46	4	171233.4	195.0	46 - 1289	60.86
EleCarcass 3	10	1	0	80.9	195.0	1 - 28	1.39
EleCarcass 4	10	1	0	78.5	192.0	1 - 28	1.39
All E carcasses	19	2	0	150.8	133.1	2 - 44	2.65
Giraffe	29	3	1	712.6	192.8	3 - 83	4.04
Impala	485	51	0	97716	132.8	51 - 1128	67.55
Kudu	19	2	0	313.7	191.9	2 - 55	2.65
Warthog	67	7	0	3879.5	192.8	7 - 195	9.33
Wildebeest	1378	145	75	1664620	192.8	145 - 4035	191.92
Zebra	1521	160	190	805164	121.5	160 - 3369	211.84
Cattle	8553	900	539	1.12E+07	80.8	1646 - 15460	1191.23
Sheep/goats	133	14	0	5598.7	115.8	14 - 287	18.52

RKSAW : Rooikat South A W part Area: 718 km² Sampling Intensity: 10.418%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
Giraffe	29	3	0	683.4	189.4	3 - 83	4.04
Hippopotamus	144	15	0	17086.1	189.4	15 - 417	20.06
Impala	58	6	0	2811.4	192.0	6 - 168	8.08
Kudu	38	4	0	1215	189.4	4 - 111	5.29
Sable	77	8	0	4860	189.4	8 - 222	10.72
Warthog	10	1	0	78.1	192.0	1 - 28	1.39
Wildebeest	605	63	31	301398.9	189.4	63 - 1750	84.26
Zebra	2544	265	106	1311133	93.9	265 - 4932	354.32
Jackal BB		2					
Ostrich	0	0	1	0	0	0 - 0	0
Cattle	10626	1107	254	9835102	61.6	4084 - 17168	1479.94
Sheep/goats	1325	138	0	289131.1	84.7	203 - 2446	184.54

RKSBW : Rooikat South B W part Area: 718 km² Sampling Intensity: 10.18%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
EleCarcass 4	20	2	0	164.4	136.1	2 - 46	2.79
All E carcasses	20	2	0	164.4	136.1	2 - 46	2.79
Giraffe	20	2	0	318.8	189.6	2 - 57	2.79
Impala	265	27	0	58065.6	189.5	27 - 768	36.91
Kudu	49	5	0	912.3	128.3	5 - 112	6.82
Reedbuck	10	1	0	80.9	191.0	1 - 29	1.39
Warthog	20	2	0	318.6	189.5	2 - 57	2.79
Wildebeest	393	40	20	55662	125.2	40 - 885	54.74
Zebra	1090	111	305	435211.1	126.2	111 - 2467	151.81
Hyaena		1					
Horse	10	1	0	79.7	189.5	1 - 28	1.39
Cattle	8772	893	481	8543288	69.5	2675 - 14869	1221.73
Sheep/goats	648	66	0	133543.8	117.6	66 - 1411	90.25
OtherCarcass 2	10	1	0	93.4	205.2	1 - 30	1.39

Rooikat South: Mean (ECSE,RKSAW,RKSBW) Area: 718 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	146	46	4	19025.9	189.0	46 - 421	20.29
ElephantFamily	146	46	4	19025.9	189.0	46 - 421	20.29
EleCarcass 3	3	1	0	9	189.0	1 - 9	0.44
EleCarcass 4	10	3	0	27	106.8	3 - 20	1.35
All E carcasses	13	4	0	35	91.7	4 - 25	1.79
Giraffe	26	8	1	190.5	107.5	8 - 53	3.57
Hippopotamus	48	15	0	1898.5	181.3	15 - 135	6.68
Impala	269	84	0	17621.4	98.5	84 - 534	37.49
Kudu	36	11	0	271.2	92.6	11 - 68	4.95
Reedbuck	3	1	0	9	182.8	1 - 9	0.46
Sable	26	8	0	540	181.3	8 - 72	3.57
Warthog	32	10	0	475.1	136.4	10 - 75	4.45
Wildebeest	792	248	126	224631.2	119.5	248 - 1738	110.29
Zebra	1718	536	601	283500.9	61.9	655 - 2782	239.31
Hyaena		1					
Jackal BB		2					
Ostrich	0	0	1	0	0	0 - 0	0
Horse	3	1	0	8.9	181.4	1 - 9	0.46
Cattle	9317	2900	1274	3291655	38.9	5694 - 12940	1297.65
Sheep/goats	702	218	0	47586	62.1	266 - 1138	97.77
OtherCarcass 2	3	1	0	10.4	196.5	1 - 10	0.46

East Zambesi South (ECSW+Rooikat S) Area: 3099 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	1343	172	242	232808	71.4	385 - 2302	43.34
ElephantFamily	1315	169	241	229998.8	72.5	362 - 2267	42.42
ElephantBull	29	3	1	388.1	137.3	3 - 68	0.92
EleCarcass 2	10	1	0	81.6	188.8	1 - 27	0.31
EleCarcass 3	22	3	0	169	116.5	3 - 48	0.72
EleCarcass 4	57	8	0	889.4	103.5	8 - 116	1.85
All E carcasses	89	12	0	1565	88.4	12 - 168	2.87
Buffalo	2119	223	90	1888343	128.8	223 - 4849	68.38
Duiker	29	3	0	230.5	105.8	3 - 59	0.92
Giraffe	26	8	1	190.5	106.9	8 - 53	0.83
Hippopotamus	48	15	0	1898.5	180.4	15 - 135	1.55
Impala	269	84	0	17621.4	98.0	84 - 533	8.69
Kudu	36	11	0	271.2	92.1	11 - 68	1.15
Reedbuck	89	10	0	2439	110.5	10 - 187	2.87
Sable	26	8	0	540	180.4	8 - 72	0.83
Steenbok	10	1	0	80	187.0	1 - 27	0.31
Warthog	60	13	0	1209.5	114.3	13 - 130	1.95
Wildebeest	792	248	126	224631.2	118.9	248 - 1733	25.55
Zebra	4864	867	897	3669026	78.2	1058 - 8669	156.95
Hyaena		1					
Jackal BB		2					
GroundHornbill	29	3	0	728.3	188.1	3 - 82	0.92
Ostrich	0	0	1	0	0	0 - 0	0
Horse	3	1	0	8.9	180.5	1 - 9	0.11
Cattle	41695	6307	2879	4.00E+07	30.1	29132 - 54258	1345.42
Sheep/goats	3211	482	38	497017.5	43.6	1810 - 4611	103.61
OtherCarcass 2	22	3	0	169.7	116.2	3 - 48	0.72
Logging	10	1	0	82.2	189.5	1 - 28	0.31

RKSAE : Rooikat South A - East Part Area: 1245 km² Sampling Intensity: 10.418%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	0	0	4	0	0	0 - 0	0
ElephantBull	0	0	4	0	0	0 - 0	0
EleCarcass 3	29	3	0	725.6	195.1	3 - 85	2.33
EleCarcass 4	10	1	0	78.2	192.1	1 - 28	0.8
All E carcasses	38	4	0	760.2	149.8	4 - 96	3.05
Buffalo	0	0	136	0	0	0 - 0	0
Hippopotamus	96	10	0	5642.7	163.2	10 - 253	7.71
Impala	307	32	0	87193.2	200.5	32 - 923	24.66
Waterbuck	29	3	0	728.2	195.5	3 - 85	2.33
Zebra	3254	339	324	1915241	88.7	367 - 6141	261.37
Crocodile	29	3	0	446.9	153.1	3 - 73	2.33
Pig	67	7	0	4121.8	199.3	7 - 201	5.38
Cattle	24795	2583	1266	3.41E+07	49.1	12611 - 36978	1991.57
Sheep/goats	269	28	0	23930.9	120.1	28 - 591	21.61
OtherCarcass 1	19	2	0	334.1	198.6	2 - 57	1.53
OtherCarcass 2	10	1	0	84.7	199.9	1 - 29	0.8
OtherCarcass 4	29	3	0	245.1	113.4	3 - 61	2.33

RKSBE : Rooikat South B - East part Area: 1245 km² Sampling Intensity: 10.18%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	1257	128	41	711327.9	139.9	128 - 3017	100.96
ElephantFamily	1257	128	41	711327.9	139.9	128 - 3017	100.96
EleCarcass 4	20	2	0	149.7	129.9	2 - 45	1.61
All E carcasses	20	2	0	149.7	129.9	2 - 45	1.61
Hippopotamus	88	9	0	2998.5	129.2	9 - 203	7.07
Impala	255	26	30	59590.8	199.4	26 - 765	20.48
Warthog	49	5	0	2124.2	195.7	5 - 145	3.94
Wildebeest	147	15	0	19501.9	197.7	15 - 439	11.81
Zebra	3664	373	389	3089135	100.1	373 - 7330	294.3
Crocodile	98	10	0	2514	106.5	10 - 203	7.87
GroundHornbill	10	1	0	86.9	197.9	1 - 29	0.8
Cattle	27948	2845	2292	4.02E+07	47.3	14718 - 41177	2244.82
Sheep/goats	452	46	18	60153.4	113.2	46 - 963	36.31
OtherCarcass 1	10	1	0	91.3	202.9	1 - 30	0.8

SALA : Salambala-Impalila A Area: 1253 km² Sampling Intensity: 10.628 %

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	452	48	52	51549.9	107.1	48 - 936	36.04
ElephantFamily	376	40	51	39451.8	112.5	40 - 800	30.04
ElephantBull	75	8	1	1382.1	105.3	8 - 155	6.01
Buffalo	847	90	935	653880.6	203.5	90 - 2570	67.58
Hippopotamus	169	18	0	8856.4	118.4	18 - 370	13.52
Lechwe	47	5	0	2018.1	203.5	5 - 143	3.75
Monkey	122	13	0	4093.2	111.5	13 - 259	9.76
Zebra	2183	232	276	1015635	98.4	232 - 4331	174.21
Crocodile	19	2	0	167.7	146.7	2 - 46	1.5
Cattle	26458	2812	1477	3.31E+07	46.3	14199 - 38717	2111.6
Sheep/goats	452	48	0	134043.3	172.8	48 - 1232	36.04
OtherCarcass 2	9	1	0	80	202.6	1 - 28	0.75
OtherCarcass 3	9	1	0	79	201.3	1 - 28	0.75
OtherCarcass 4	9	1	0	77.9	200.0	1 - 28	0.75

SALB : Salambala-Impalila B Area: 1253 km² Sampling Intensity: 10.99%

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	318	35	90	13201.1	76.5	75 - 562	25.42
ElephantFamily	273	30	89	13102.9	88.9	30 - 516	21.78
ElephantBull	45	5	1	757.1	128.2	5 - 104	3.63
EleCarcass 2	0	0	1	0	0	0 - 0	0
EleCarcass 4	45	5	0	528.8	107.2	5 - 94	3.63
All E carcasses	45	5	1	528.8	107.2	5 - 94	3.63
Buffalo	728	80	47	485679.2	203.0	80 - 2205	58.09
Hippopotamus	36	4	0	593.1	141.9	4 - 88	2.9
Impala	0	0	50	0	0	0 - 0	0
Lechwe	136	15	0	16876.2	201.8	15 - 412	10.89
Wildebeest	273	30	0	63687	196.0	30 - 808	21.78
Zebra	1228	135	574	329742.3	99.1	135 - 2446	98.03
Crocodile	45	5	4	870.8	137.5	5 - 108	3.63
Pig	64	7	0	3675.3	201.8	7 - 192	5.08
Cattle	22201	2440	3311	1.32E+07	34.6	14512 - 29889	1771.79
Sheep/goats	136	15	0	3851.9	96.4	15 - 268	10.89
OtherCarcass 3	9	1	0	74.8	201.5	1 - 27	0.73
OtherCarcass 4	18	2	0	136.2	136.0	2 - 43	1.45

Salambala Mean (SALA, SALB, RKSAE, RKSBE) Area: 1245 km²

SPECIES	Pop. est.	No. seen	No. Out	Variance	PRP%	95%Range	No./ 100km²
All Elephants	507	211	187	48504.9	86.6	211 - 946	40.71
ElephantFamily	477	198	181	47742.7	91.4	198 - 912	38.29
ElephantBull	30	13	6	133.7	76.4	13 - 53	2.43
EleCarcass 2	0	0	1	0	0	0 - 0	0
EleCarcass 3	7	3	0	45.4	186.5	3 - 21	0.58
EleCarcass 4	19	8	0	47.3	73.4	8 - 32	1.5
All E carcasses	26	11	1	89.9	73.0	11 - 45	2.08
Buffalo	394	170	1118	71222.5	135.2	170 - 926	31.62
Hippopotamus	98	41	0	1130.7	68.7	41 - 165	7.83
Impala	141	58	80	9174	135.8	58 - 332	11.3
Lechwe	46	20	0	1180.9	149.3	20 - 114	3.69
Monkey	31	13	0	255.8	104.3	13 - 62	2.46
Warthog	12	5	0	132.8	187.1	5 - 35	0.99
Waterbuck	7	3	0	45.5	186.8	3 - 21	0.58
Wildebeest	105	45	0	5199.3	136.8	45 - 249	8.44
Zebra	2582	1079	1563	396859.6	48.6	1326 - 3838	207.42
Crocodile	48	20	4	250	65.9	20 - 79	3.84
GroundHornbill	2	1	0	5.4	189.2	1 - 7	0.2
Pig	33	14	0	487.3	134.5	14 - 77	2.63
Cattle	25350	10680	8346	7535565	21.6	19877 - 30824	2036.17
Sheep/goats	327	137	18	13873.7	71.8	137 - 562	26.28
OtherCarcass 1	7	3	0	26.6	141.7	3 - 18	0.58
OtherCarcass 2	5	2	0	10.3	134.6	2 - 11	0.38
OtherCarcass 3	5	2	0	9.6	133.6	2 - 11	0.37
OtherCarcass 4	14	6	0	28.7	75.8	6 - 25	1.13

Re: [EXTERNAL] RE: Jul 26 2019 10:30:00; Acknowledgement letter for Permit No. "91307C""-- Randolph Schumacher-Elephant

Management Authority, FWHQ <ManagementAuthority@fws.gov>

Thu 10/1/2020 8:25 AM

To: Cindi Rulon <Cindi.Rulon@procargousa.com>
Bcc: Cogliano, Mary <mary_cogliano@fws.gov>

Good morning Cindi,

Thank you for the addional in formaon. Y our Power of A orney as well as the Namibian MET Wildlife Survey have been added to Mr. Schumacher's applicaon (#91307C).

We appreciate your me and c onsideraon.

****
U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
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5275 LEESBURG PIKE
FALLS CHURCH, VA 22041-3803

From: Cindi Rulon <Cindi.Rulon@procargousa.com>
Sent: Wednesday, September 30, 2020 11:29 AM
To: Management Authority, FWHQ <ManagementAuthority@fws.gov>
Subject: RE: [EXTERNAL] RE: Jul 26 2019 10:30:00; Acknowledgement le er for Permit No. "91307C""-- Randolph Schumacher-Elephant

Hi DMA,

So sorry—I a ached the POA for Mr. Schumacher.

Best Regards,
Cindi Rulon

Pro Cargo USA
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From: Management Authority, FWHQ [mailto:ManagementAuthority@fws.gov]
Sent: Wednesday, September 30, 2020 8:12 AM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>
Subject: Re: [EXTERNAL] RE: Jul 26 2019 10:30:00; Acknowledgement le er for Permit No. "91307C""-- Randolph Schumacher-Elephant

Good morning Cindi,

Thank you for your inquiry. We do not see a Power of A orney submi ed with this applicaon, please provide.

We appreciate your me and c onsideraon.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
Reply to: ManagementAuthority@fws.gov
http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

****

New mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
MS: IA
5275 LEESBURG PIKE
FALLS CHURCH, VA 22041-3803

From: Cindi Rulon <Cindi.Rulon@procargousa.com>
Sent: Tuesday, September 29, 2020 12:40 PM
To: Management Authority, FWHQ <ManagementAuthority@fws.gov>
Subject: [EXTERNAL] RE: Jul 26 2019 10:30:00; Acknowledgement le er for Permit No. "91307C""-- Randolph Schumacher-Elephant

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Dear DMA,

I a ached the Namibian MET Wildlife Survey -- please add it to the data for Randolph Schumacher's elephant permit applicaon # 91307C.

Best Regards,
Cindi Rulon

Pro Cargo USA
Hunting Trophy Imports
Direct Tel 281.220.3176
Direct Fax 281.664.4440
15619 Morales Rd.
Houston, TX 77032

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

From: Randolph Schumacher <randy@fitnessinsurance.com>
Date: July 26, 2019 at 10:43:55 AM MDT
To: Kara Schumacher <kara@fitnessinsurance.com>
Subject: Fwd: Jul 26 2019 10:30:00; Acknowledgement letter for Permit No. "91307C""

Randy Schumacher
(b) (6)

A division of Brown & Brown of Colorado, Inc.
For after-hours insurance emergencies, please call 800-881-7130.
dba Fitness Insurance Agency in MI, TX, NY, NC. CA License Number 0G00756.

Begin forwarded message:

From: SPITS-II Production Email Messenger <permits@fws.gov>
Date: July 26, 2019 at 8:30:02 AM MDT
To: (b) (6)
Cc: <permits@fws.gov>
Subject: Jul 26 2019 10:30:00; Acknowledgement letter for Permit No. "91307C""
Reply-To: <permits@fws.gov>

RANDOLPH PAUL SCHUMACHER
(b) (6)

***This is an automatically generated email, please do not reply to this message**

***For questions please send an email directly to managementauthority@fws.gov ***

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 05/15/2018; check number 1062 accompanied the application for AFRICAN ELEPHANT. Your application has been assigned the following PRT identification number: MA91307C-0While 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 notification to make any inquiries. Should you have additional information that you need to provide to our office pertaining to the current request, we ask that you call our office first at 800-358-2104 or email managementauthority@fws.gov to obtain further instructions.

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
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May 3, 2018

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

Re: 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

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

NOTICE OF REPRESENTATION

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

Name: DONALD F. ROBILLARD JR

Date: 04/23/2018

Form 3-200-20

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

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

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:

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

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

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Robillard	Donald	Francis	Jr

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

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

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

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Dallas	Texas	75229	Dallas	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

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:
(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) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

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

NA

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Lexodanta 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:	POBOX 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 rangersin 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 QUESTIONS 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 United States, cannot be re-exported.

    Applicant's signature: (b) (6) [redacted] 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).

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Trophy Application

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Tue, Oct 1, 2019 at 11:45 AM
To: permits@conservationforce.org

Hi Regina,

As you know I am going through all of the old elephant trophy applications trying to determine what applications are needed, and what applications can be withdrawn. I appreciate your patience and help, especially after you sent me that list. I am just attempting to be extremely thorough. Therefore, I will be sending an email for each application I locate as I go through the pile of paper.

On **05/15/2018** an applica on for the importa on of an African Elephant, sport hunted trophy was received by this office **Prt # 90749C**. At the me of the applica on's submission the hunt was to be held at a future date.
Please confirm at this me if you successfully hunted the elephant. If **yes**, please state so, and provide the date and loca on the elephant was taken.

If **no**, do wish to withdraw your applica on at this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific loca on, and date. Permit applica ons and fees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applica on.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] Re: Sport Hunted Trophy

1 message

Don Robillard (b) (6) Tue, Oct 1, 2019 at 4:27 PM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>, permits@conservationforce.org

Reference: Prt # 90749C

Dear Mr. Mac Donald,

I am confirming that my 2018 sport hunted African Elephant hunt was successful. The bull elephant was taken on June 28, 2018 in the Republic of Namibia: Kavango East Bwabwata West; S 18 09 162 E 021 42 495 (Camp location). The more precise location where the elephant was harvested is S 18 07 31.18 E 21 41 33.02

Please advise if you have any further questions or need further information.

Yours sincerely,

Don Robillard
(b) (6)

On Mon, Sep 30, 2019 at 2:21 PM MacDonald, Tim <tim_macdonald@fws.gov> wrote:

> Donald
>
> U.S. Fish and Wildlife Service Prt # 90749C
>
> On **05/15/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 90749C**. At the me of the applic aon's submission the hunt was to be held at a future date.
>
> Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.
>
> If **no**, do wish to withdraw your applicaon a t this me?
>
> **Please confirm the current status.**
>
> ****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*
>
> Thank you,
>
> **Tim Mac Donald**
>
> **Government Information Specialist**
> **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

MacDonald, Tim <tim_macdonald@fws.gov>

Re: [EXTERNAL] Re: Elephant Trophy Application

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Thu, Oct 3, 2019 at 2:20 PM
To: "Emma C. Sampson" <permits@conservationforce.org>

It is Donald Francis Robillard.

Thank you,

Tim Mac Donald

Government Information Specialist
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 3, 2019 at 1:46 PM Emma C. Sampson <permits@conservationforce.org> wrote:

> Good afternoon Mr. MacDonald,
>
> We were wondering if you could provide us with the Applicant's name, please?
>
> Thank you,
>
> Emma
>
> > On October 1, 2019 at 10:45 AM "MacDonald, Tim" <tim_macdonald@fws.gov> wrote:
> >
> > Hi Regina,
> >
> > As you know I am going through all of the old elephant trophy applications trying to determine what applications are needed, and what applications can be withdrawn. I appreciate your patience and help, especially after you sent me that list. I am just attempting to be extremely thorough. Therefore, I will be sending an email for each application I locate as I go through the pile of paper.
> >
> > On **05/15/2018** an applica on for the importa on of an African Elephant, sport hunted trophy was received by this office **Prt # 90749C** . At the me of the applica on's submission the hunt was to be held at a future date.
> > Please confirm at this me if you successfully hunted the elephant. If **yes**, please state so, and provide the date and loca on the elephant was taken.
> >
> > If **no**, do wish to withdraw your applica on at this me?
> >
> > **Please confirm the current status.**
> >
> > ****Please note the permit that was applied for was for a specific loca on, and date. Permit applica ons and fees are not transferable to another hunt, and so if you have scheduled a different*

hunt, you must submit a new applica on.

Thank you,

Tim Mac Donald

Government Information Specialist
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

Emma C. Sampson
CONSERVATION FORCE, *Permits Division*
3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

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.:		179855
VALID FROM:		18.06.18
VALID TO:		29.06.18
RECEIPT No.:		575860

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.F. Rubillard (Jr)

Residential Address: .....

Country: U.S.A

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

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	2X
I	Crocodile	/
	Dik-dik	
	Eland	
I	Elephant	1X
	Giraffe	/
	Grey Duiker	
II	Hippopotamus	/
	Impala. Black-faced	
	Impala. common	1X
	Klipspringer	
	Kudu	/
II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	/
	Red hartebeest	
	Reedbuck	1X
I	Rhinoceros, black	/
I	Rhinoceros, white	
	Roan	/
	Sable	1X
	Springbok	/

	SPECIES: COMMON NAME	Number
	Steenbok	—
	Warthog	1X
	Waterbuck	/
	Wildebeest, blue	
	Zebra, Burchell's	
II	Zebra, Hartman's mountain	/
	Blesbok	
	Wildebeest, black	
I	Cheetah	/
I	Leopard	
II	Lion	/
	Other	—
	*Please report within 48hours after hunt	/

on the following farms / hunting concessions: Bre Bnata West

.....

Guided by (name of guides): J.H. Pienaar (Sr)

.....

MINISTRY OF ENVIRONMENT & TOURISM
Wabes R. Hamata
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.

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
31-05-2018
WINDHOEK
Private Bag 13306
Tel: 284 2111

Official MET date stamp

IMPORTANT: This permit is not valid if altered in anyway

typoprint 2931/1 - Tel: 061 228777

Quote

HUNTAFRICA NAMIBIA SAFARIS

HUNTAFRICA NAMIBIA cc

PO Box 1100
Gobabis
Namibia

Tel / Fax +264 62 56 3700
Mobile +264 81 124 3299

Email: info@huntafrica.com.na
Internet: www.huntafrica.com.na
VAT Reg 2548664-01-5

DATE	Quote
04.08.2017	Q-18200

INVOICE TO:
Don Robbilard
2018 Hunt

DAILY FEES	DAILY RATES (US$)	CLIENTS #	DAYS #		TOTAL (US$)
Elephant	3,097.50	1	14		43,365.00
Buffalo	1,159.14	1	7		8,113.98
(2nd Animal-40% Discount on daily fee=14140-40%)					-
* 15% discount on total daily fees					-7,722.00
TOTAL Daily Fees (15% VAT Applicable - Not included)					43,756.98

TROPHY FEES	TROPHY FEES (US$)	TROPHIES #		TOTAL (US$)
Hunt Dates: 2018				
Elephant	40,425	1		40,425.00
(Tusks 80lb < additional trophy fee)	6,000			not included
Buffalo	20,790	1		20,790.00
Sable	21,700	1		21,700.00
* 15% discount on total trophy fees				-12,437.00
TOTAL Trophy Fees				70,478.00

OTHER FFES	TOTAL (US$)
TOTAL Other Fees (15% VAT Applicable - Not included)	-

VAT - (PAYABLE ONLY AT END OF HUNT - NOT TAKEN INTO ACCOUNT FOR DEPOSIT)		6,563.55
TOTAL	US$	120,798.53
DEPOSIT PAYABLE (US$) - 50%	US$	57,117.49

PAID 17 Aug 201

BANK DETAILS:

Standard Bank Namibia
PO Box 32
Gobabis
Namibia, Africa

(b) (6)

Hunting fees include:

1. All basic safari fees. (accommodation, food, all drinks - house brands, vehicle)
2. Hunting permits for Namibia
3. Trained African skinners and trackers
4. Field preparation of trophies

Hunting fees exclude:

1. Taxidermist charges
2. Dipping and mounting of trophies
3. Freight agent's packing and shipping
4. Rifle hire and ammunition
5. African Staff Tips (Gratuities)
6. 15% VAT on accomodation

Special Notes:

1. All wounded game not found will be regarded as hunted
2. We require a 50% deposit to confirm the booking of a hunt
3. Final payment - wire transfer or cash

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

June 27, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine - Namibia
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-Mail; Amy_Brisendine@FWS.gov

RE: PRT # 90749C – Applicant - Donald Robillard, Jr.
Supplement to Import Permit Application for Sport Hunted Elephant Trophy from Namibia

Ms. Brisendine:

This is a supplement to the existing application, PRT # 90749C for an Elephant Trophy Import from Namibia for applicant Don Robillard, Jr.

Supplementary Answers for after the Hunt detailed below:

Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or huntingblock, AND nearest city) where wildlife was removed from the wild:

The elephant was taken in the Republic of Namibia, Kavango West East Bwabwata West. Precise location of the hunt – S 18 07 31.18 E 21 41 33.02

Date wildlife was hunted

The Wildlife was taken on June 28, 2018.

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

The trophies are currently stored at Trophaendienste Taxidermey, P.O. box 21068, Windhoek, Republic of Namibia. Professional Hunter – Jacobus Hugo Pinaar, Hunt Africa Namibia, P.O. Box 1100, Gobabis, Omaheke, Namibia.

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 for Hunting Permits

We have also provided the Operator Enhancement Report from Hunt Africa Namibia and the invoice for this hunt with trophy fees listed, which we ask to be included with the other enhancement documentation and in response to question #9 of the application.

These documents show that the hunting is well-managed and regulated on lawful sport hunted trophies in Namibia. Please consider these attached documents and the ones previously provided along with the supplemental information regarding the hunt above, in making a positive enhancement finding for this elephant permit application.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. Don Robillard w/attachments

Enclosures:
a. Operator Enhancement Report- Hunt Africa Namibia
b. Donald Robillard Hunting Permits
c. Invoice for hunt with trophy fees

OPERATOR ENHANCEMENT QUESTIONNAIRE

1. **OPERATOR INFORMATION**
   a. Name of Area Operator: HUNTAFRICA NAMIBIA
   b. Years in business: 32 years
   c. Name of Company conductinghunt: HUNTAFRICA NAMIBIA
   d. City where hunt will take place:
   e. Country where hunt will take place: NAMIBIA

2. **CONCESSION**
   a. Name of Concession: Bwabwata west National park
   b. Area in Km^2: 3800
   c. Land tenure: Government lease
      Government x Community Private Ranch Private Conservancy Lease
   d. Length of Concession Agreement: 5 years
   e. Can it be renewed? x Yes No
   f. Length of Renewal, if applicable: 5 years
   g. Estimated total amount received in trophy fees last year, if applicable:
   h. Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:
      Yes, annual reporting: detailed report to the Ministry of Environment & Tourism, of each client and every animal that was hunted.
   i. Please provide the Concession location and nearest City: S 18 09°C 162 E 021 42°C 495, Rundu (bigger town) Divundu (very small town)
   j. Please attach a map or maps with the boundaries marked and showing the nearest City attached
   k. If the Concession borders a National Park, please provide Park name: Inside the Bwabwata National park
   l. Description of general and distinctive habitat features and any water features:
      Bushveld
      The Okavango river forms the western border

3. **COMMUNITIES IN THE CONCESSION**
   a. Are there any communities living in the Concession? x Yes No
   b. If so, estimated number of people or villages in the Concession? 1 Village – Omega – 1000 people
   c. Are there communities bordering this Concession? x Yes No
   d. If so, estimated number of people or Villages around the Concession?
      Muchiko area – 500 people

4. **RELEVANT GAME POPULATIONS IN THE CONCESSION:**[1]

[1] The new Fish and Wildlife Services (FWS) Import Permit Application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species Name	Relative Abundance			Estimated Population	3-Year trend			How is it monitored?
	Dense	Avg.	Sparse		Up	Down	Stable	
Elephant	x			2500			x	By counts
Lion			x		x			
Leopard	x						x	
Prey species								

5. Local Community Participation
   a. Total employment number: 40
   b. Please identify the number and type of all employees:

Employee 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:		

6. 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:

Employee 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		
Community Relations Personnel	1		
Others:			

7. Anti-Poaching Efforts:[2]
   a. Number of Anti-Poaching staff:
   b. Are Anti-Poaching Patrols conducted during the hunting season, off-season, or **both?**
      x
      Hunting season: _____ Off-season: _____ **Both seasons:** x

[2] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

c. Months during which Anti-Poaching Patrols are conducted: **All 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 & Tourism

7. **ANTI-POACHING EFFORTS *[CONTINUATION]***

g. Do you offer rewards to poaching informants leading to arrest? x Yes ____ No

h. Do you offer rewards to poaching informants upon conviction? ____ Yes x No

i. Please describe the company's anti-poaching expenditures below:

TYPE OF EXPENSE	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
SALARIES FOR ANTI-POACHING SCOUTS	N$ 31200	N$ 31200	N$ 31200	
EQUIPMENT				
VEHICLES	4x4 vehicle	4x4 vehicle	4x4 vehicle	
PETROL	As needed	As needed	As needed	
REWARDS PAID				
OTHER: _____				Each person arrested, the informer get N$ 5000 per case
OTHER: _____				
TOTALS				

j. What currency are the expenditures given in? **Namibian Dollar**

8. **ANTI-POACHING RESULTS:**

CATEGORY	2016	2017	2018	REMARKS
POACHING INCIDENTS DISCOVERED				
ELEPHANT CARCASSES OBSERVED				
LION CARCASSES OBSERVED				
LEOPARD CARCASSES OBSERVED				
IVORY POACHERS ARRESTED				
MEAT POACHERS ARRESTED				
OTHER POACHERS ARRESTED				
POACHERS CONVICTED				
SNARES/GIN TRAPS COLLECTED				
FIREARMS CONFISCATED				
VEHICLES CONFISCATED				
BICYCLES CONFISCATED				

BOATS/NETS CONFISCATED				
TUSKS RECOVERED				
OTHER: _____				

9. COMMUNITY INVESTMENT:[3]
   a. Does the Company contribute money or goods/services to local communities?
      x Yes _____ No
   b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
      2,5 Million Namibian Dollars, required by law, required by contract & voluntary contribution
   c. Does the Company provide game meat to nearby communities? **Yes x** No
   d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:
      45 tons of 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.
      N/A
   f. Please describe any consolation payments made to local residents damaged by game species
      N/A
   g. What currency are the expenditures reported in? **Namibian Dollars**

SPECIES	DAMAGE CAUSED	CONSOLATION PAID 2016	CONSOLATION PAID 2017	CONSOLATION PAID 2018
ELEPHANT				
LION				
LEOPARD				
OTHER				

   a. Please describe any community projects paid for by the Company:
   b. What currency are the expenditures reported in? **Namibian Dollars**

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
EDUCATION (E.G.: CLASSROOMS, OFFICES)	**N$ 95000**	**N$ 110000**	**N$ 120 000**	
EDUCATION (E.G.: SCHOOL FEES, SCHOOL SUPPLIES)				
HEALTH (E.G.: CLINICS, OFFICES)				
HEALTH (E.G.: MEDICAL SALARIES, EQUIPMENT)				

[3] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

COMMUNITY SCOUT SALARIES					
OTHER COMMUNITY ANTI-POACHING					

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS	
LOCAL GOVERNMENT ACTIVITIES					
WATER INFRASTRUCTURE IMPROVEMENTS	1 Borehole + water installation N$ 40,000				
SPORTS TEAMS FUNDED	1 team N$ 90,000	1 team N$ 90,000	1 team N$ 90,000		
CONSTRUCTION MATERIALS DONATED	N$ 500,000	N$ 500,000	N$500,000		
OTHER: _____					
OTHER: _____					
TOTALS					

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	HUNTING ELEPHANT	HUNTING LION	HUNTING LEOPARD	HUNTING ALL SPECIES
NUMBER OF U.S. CLIENTS	2016: 6	2016:	2017 2	201
	2017: 6	2017:	2017: 2	201
	2018: 6	2018:	2018: 0	201
PERCENTAGE OF U.S. CLIENTS	2016: 100%	2016:	2016: 100%	201
	2017: 100%	2017:	2017: 100%	201
	2018: 100%	2018:	2018:	201
TROPHY FEES PAID BY U.S. CLIENTS	2016:	2016:	2016:	201
	2017:	2017:	2017:	201
	2018:	2018:	2018:	201

11. Approximate Dollar amount and/or percentage of Company's revenue from U.S. Clients: 90%

12. **OTHER INFORMATION:** Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies (e.g., aging, size, resting areas), Concession Improvements (e.g.: digging and maintaining boreholes, restocking), Management Activities, Research, etc.

Research, Hunting policies and Concession improvements by Ministry of Environment and Tourism

Restocking through Natural breeding

13. I declare that the foregoing is true and correct:

SIGNATURE

TELEPHONE: 00264 61 305767

EMAIL: accounts@tippingpoint.com.na

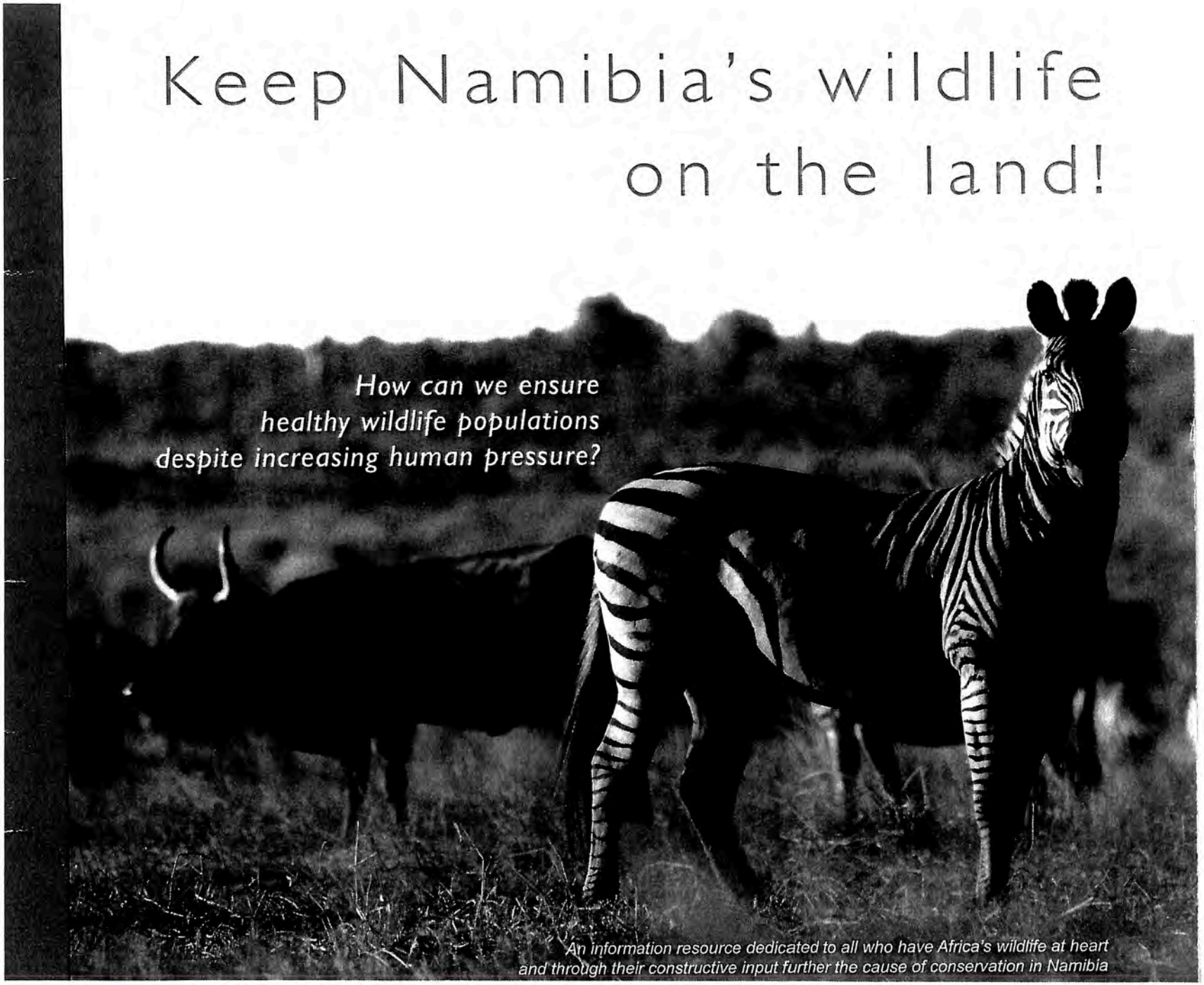
JW Chapman

PRINT - FULL NAME

Mr.

TITLE

Keep Namibia's wildlife on the land!



An information resource dedicated to all who have Africa's wildlife at heart and through their constructive input further the cause of conservation in Namibia

What is really happening to our wildlife?

WILDLIFE IS RAPIDLY DECLINING ACROSS MUCH OF AFRICA AND OTHER PARTS OF THE WORLD

Over the last century, **lions** *were actively eradicated as a threat to human safety and to livestock from most land used by people; lions from the remaining populations continue to be killed over livestock losses and safety concerns in communal areas and along the periphery of parks today.*
Southern African **rhinos** *were driven to the brink of extinction a century ago, but populations were rebuilt through effective conservation activities; rhinos are now being decimated again by ruthless commercial poaching for their horns.*
A century ago, **Elephants** *were drastically reduced by the uncontrolled ivory trade, and displaced as a threat to crops and safety; today most of the remaining southern African populations are healthy and growing, but ruthless commercial poaching for ivory is again having an impact.*
Many other species *are experiencing similar declines, mostly due to land conversion to agriculture and incompatible land uses.*

- ***Widespread concern over wildlife declines is motivating ongoing global calls for action*** *– yet interventions do not differentiate between countries with an excellent conservation track record, and those with declining wildlife populations.*
- ***Attempts by foreign organisations to stop declines through field interventions often do not address the actual problems*** *– interventions often ignore the needs of local people and conservation priorities on the ground.*
- ***The public is unfortunately not informed accurately about the main causes for large-scale wildlife declines*** *– media reports, social media hype and calls for donations tend to focus on the gruesome death of individual animals as indicators of decline, rather than actual causes.*
- ***People are confusing the welfare of individual animals with the health of entire populations of the same species*** *– through passionate but misguided social media outcries, many people want to prevent all animal deaths in order to stop perceived cruelty to animals and wildlife declines.*

PREVENTING ALL WILDLIFE DEATHS FORCES PEOPLE TO REPLACE WILDLIFE HARVESTING WITH OTHER LAND USES

Namibia's **Elephant** *population has tripled since independence and elephants have re-colonised former ranges, largely facilitated by com conservation and benefits to local communities.*

Most other large wildlife species *in Namibia have healthier populations today than at any time over the last 150 years.*

- *Differentiating between countries with successful conservation approaches and those without is essential – conservation is a sc based management activity and successful approaches should not be undermined by generalised emotional responses and inappropriate a*
- *Conservation by the people for the people is extremely successful in Namibia – by conferring rights to own and manage wildlife t communities, the Namibian government has empowered land holders to conserve wildlife in a healthy balance with other land uses.*
- *Namibians embrace wildlife management as a land use, thereby safeguarding wildlife habitat throughout the country – Namit documented significant wildlife recoveries in parks and on communal and freehold land throughout the country for several decades.*
- *By harvesting small percentages of various populations, Namibia is keeping overall wildlife stocks healthy, just as farmers anywhen world keep their overall livestock herds, gardens and fields healthy while harvesting an annual crop to generate income and enable develo*

PROMOTING WILDLIFE USE CREATES INCENTIVES TO KEEP WILDLIFE ON THE LAND AS AN ECONOMIC ASSET

The main causes of large scale wildlife declines:

ABITAT LOSS THROUGH HUMAN LAND USES THAT ARE INCOMPATIBLE WITH WILDLIFE is the largest single cause of wildlife ɔclines around the world.

Displacement of wildlife by agriculture – *wildlife is not tolerated in crop fields and competes with or threatens livestock.*

Degradation of habitat by unsuitable land uses – *overgrazing, indiscriminate burning, logging, mining etc. may all severely degrade habitats.*

Destruction of habitat through infrastructure development – *urban spread, roads, power lines, dams etc. may all destroy habitats.*

Disturbance by human activity – *excessive presence and movement of people, stray dogs, traffic, noise etc. may all displace wildlife.*

NCONTROLLED EXPLOITATION AND COMMERCIAL POACHING are causing rapid declines amongst already isolated wildlife populations many African countries.

Poaching of animals for trade in animal parts – *trade in ivory, rhino horn, skins, bones etc. is fuelling ruthless commercial poaching.*

Ruthless exploitation for personal gain – *uncontrolled over-harvesting veiled as 'legal use' is rampant in countries with poor governance.*

Proven ways to stop wildlife declines and rebuild populations:

HABITAT PROTECTION AND EXPANSION THROUGH COMMUNITY CONSERVATION BASED ON WILDLIFE USE enables large-scale wildlife recoveries, mitigates human impacts and facilitates the health of ecosystems.

Tourism *motivates conservation in scenic areas, especially along major tourism routes, by generating most jobs and some conservation funds.*

Conservation hunting *motivates conservation in vast areas of low tourism potential by generating most conservation funds and providing food.*

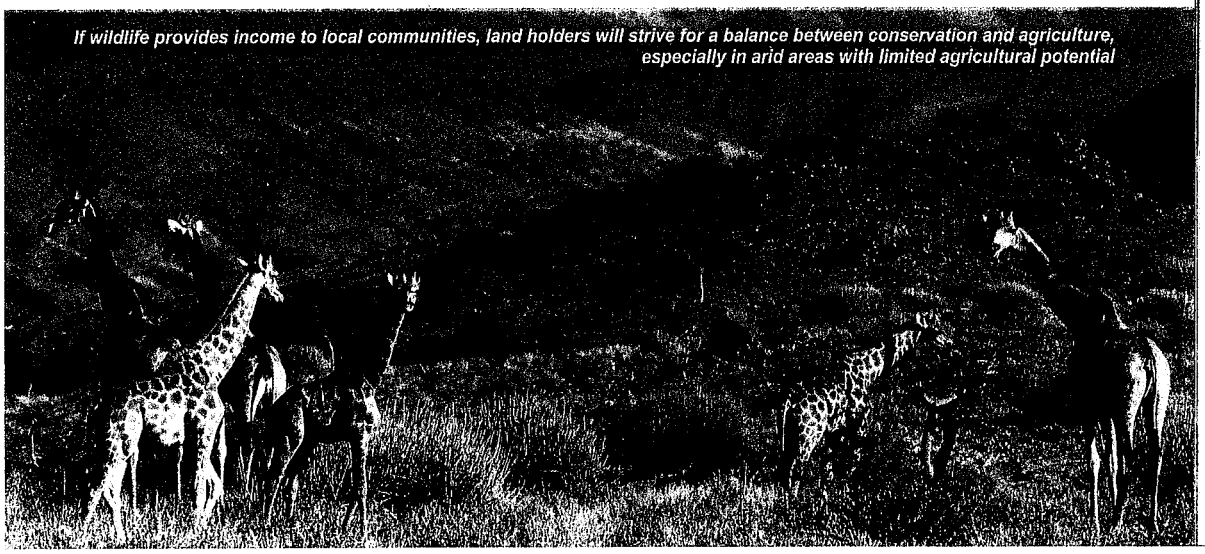
Meat harvesting *motivates increasing wildlife populations by providing food and generating additional income.*

Live capture and sale *enables restocking in areas with low populations and provides further income from wildlife.*

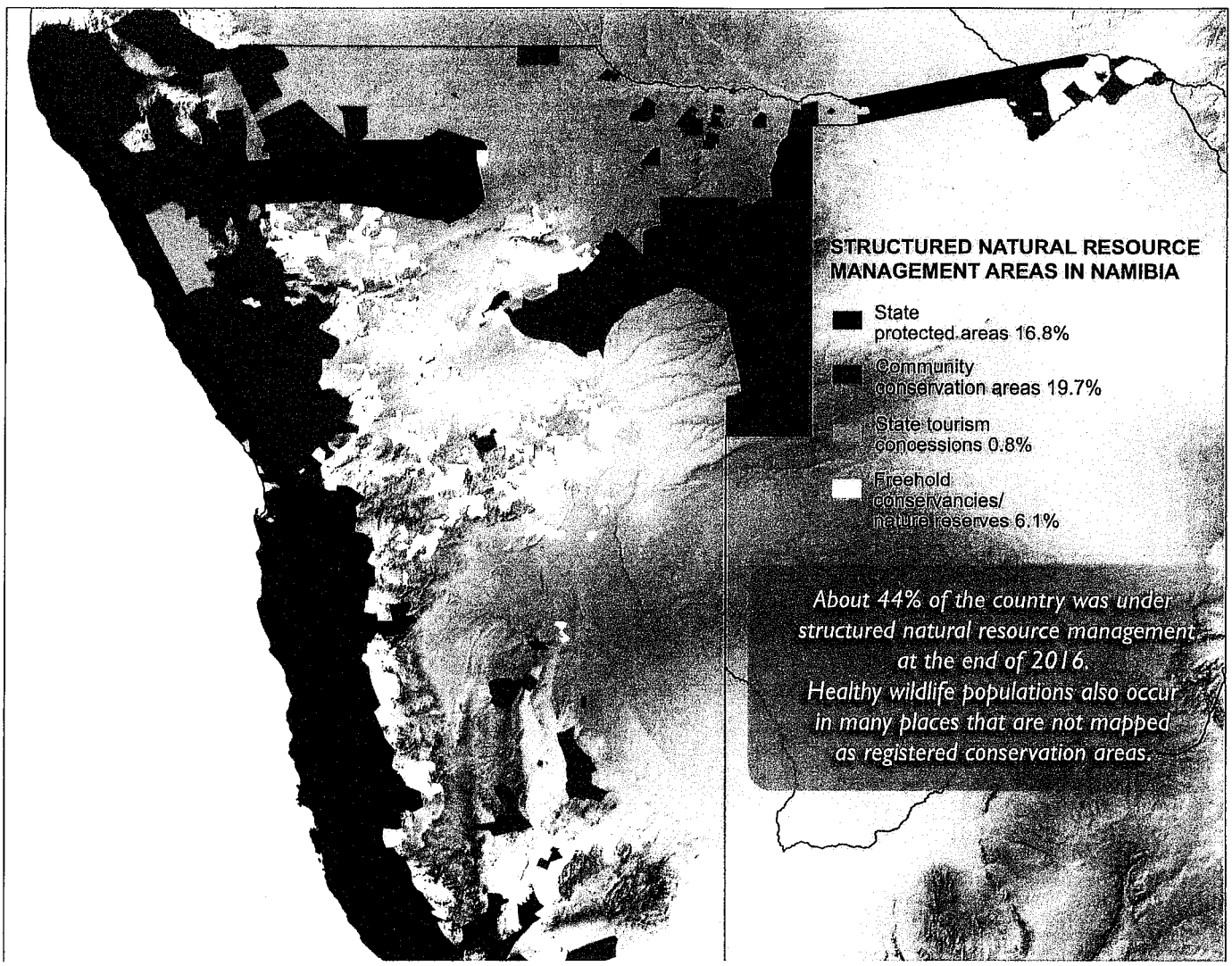
All of these uses can and should be combined where possible to maximise returns and provide a variety of benefits to different people in each community.

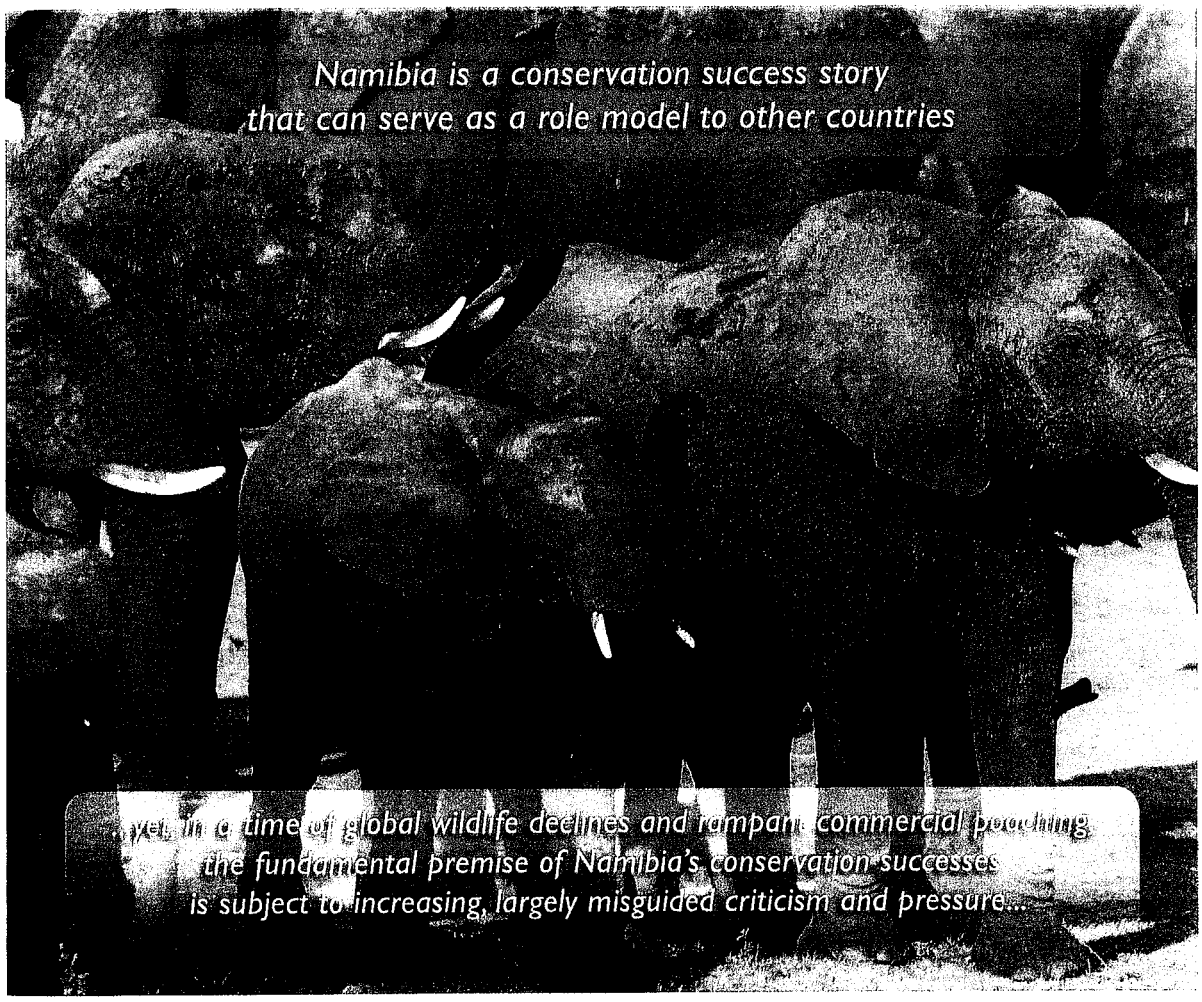
ACTIVE AND COLLABORATIVE WILDLIFE CRIME PREVENTION limits impacts from commercial poaching by teaming up relevant stakeholders including local communities, tourism and hunting operators, NGOs and government agencies.

STRINGENT CONTROL MECHANISM FOR ALL WILDLIFE USE prevent uncontrolled exploitation and over-harvesting.



If wildlife provides income to local communities, land holders will strive for a balance between conservation and agriculture, especially in arid areas with limited agricultural potential


STRUCTURED NATURAL RESOURCE MANAGEMENT AREAS IN NAMIBIA
State protected areas 16.8%
Community conservation areas 19.7%
State tourism concessions 0.8%
Freehold conservancies/ nature reserves 6.1%
About 44% of the country was under structured natural resource management at the end of 2016.
Healthy wildlife populations also occur in many places that are not mapped as registered conservation areas.


Namibia is a conservation success story
that can serve as a role model to other countries
yet, in a time of global wildlife declines and rampant commercial poaching,
the fundamental premise of Namibia's conservation successes
is subject to increasing, largely misguided criticism and pressure...

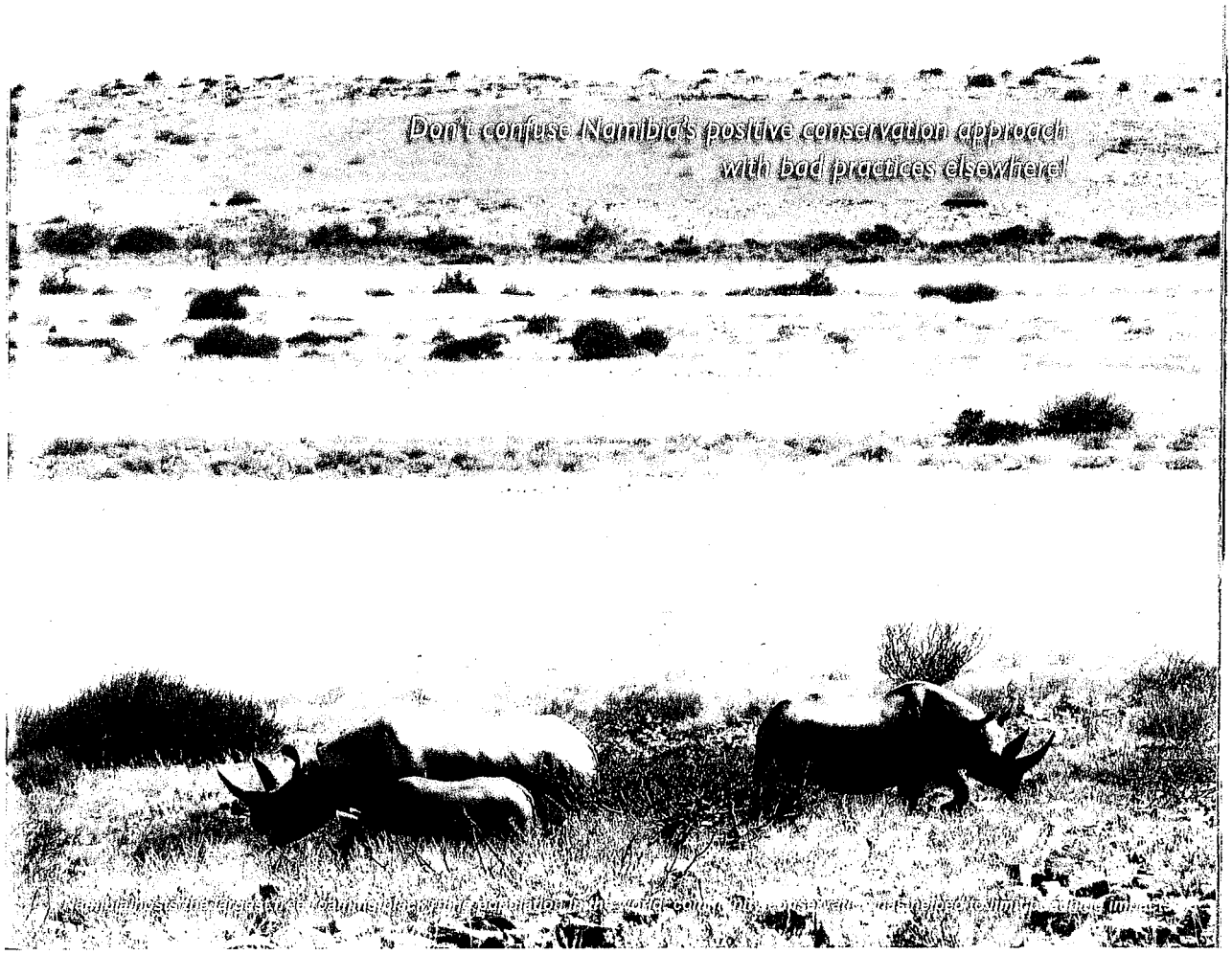
Namibia is a conservation success story:

Background information:

1. Namibia's economy is largely reliant on natural resources; about two-thirds of the human population live in rural areas and are directly dependent upon natural resources for their livelihoods.
2. Wildlife populations have shown dramatic recoveries on both freehold and communal farmland after drastic declines prior to independence due to drought, poaching and detrimental policies.
3. Healthy populations of nearly all historically-occurring species now roam suitable habitat; species of particular conservation concern are receiving special attention.
4. Agricultural policies and approaches, rather than conservation practices, have limited the population health of some species such as buffalo and wild dog.
5. Wildlife is managed and protected in national parks, in community conservation areas and on freehold land across more than half of Namibia.
6. The success is based on giving wildlife a real value for the local people who manage and protect it – and bear the cost of living with it.
7. Community conservation generated over N$ 111 million in returns for rural communities and facilitated around 5,147 jobs during 2016.
8. Community conservation contributed about N$ 692 million in net national income to Namibia's economy in 2016.
9. The sustainable use of wildlife and other natural resources is enshrined in Namibia's constitution; natural resources are a part

Conservation highlights:

1. Namibia has healthy populations of black and white rhinos, including the largest free-roaming black rhino population outside parks in the world.
2. Namibia's elephant population has grown from an estimated 7,500 animals in 1995 to around 22,000 today – a large percentage occurs outside parks.
3. Namibia has healthy lion populations in several national parks, and an expanding lion population outside parks, which has grown in north-western Namibia from an estimated 25 animals in 1995 to around 150 today.
4. Namibia has the largest population of free-roaming cheetahs in the world – the vast majority of which live outside parks.
5. Namibia has healthy giraffe populations in several national parks and an expanding giraffe population outside parks.
6. Namibia has healthy leopard populations in several national parks and leopards occur across much of Namibia's freehold and communal farmland.
7. Namibia has a healthy crocodile population with a large percentage occurring outside parks.
8. Namibia has translocated more than 10,000 animals of 15 different game species – including rare and valuable species such as black rhino, sable and giraffe – out of parks into communal and freehold areas to boost populations there.
9. Namibia has reinstated several species that had become locally extinct in communal and freehold areas.


Don't confuse Namibia's positive conservation approach
with bad practices elsewhere!

Namibia offers real solutions for wildlife inside and outside parks:

Namibia balances conservation priorities and the needs of rural communities:

In Namibia, most communal land (around 40% of the country) and privately-owned or freehold land (around 43% of the country) is used to generate a living for the land holders. Livestock herding, crop production and game management are the main land uses.

Conservation outside national parks therefore depends on giving wildlife a tangible value so that people keep it on the land – rather than eradicating it in favour of livestock, crops or other land uses.

Keeping wildlife on the land also means living with wildlife – wildlife that can be dangerous and destructive.
Disney is not reality – in real life...

*... **lions**, crocodiles and other predators eat livestock and sometimes kill people*
*... **elephants** raid crops and destroy water installations and also sometimes kill people*
... many other wild animals such as hippos, buffaloes and rhinos can also be difficult and dangerous to live with.

- *Wildlife use is a traditional and integral part of life in rural Africa – hunting is a part of African culture. This was the same in Europe and America – when people still lived from the land and the wildlife was still there.*
- *Namibia protects around 17% of its land in national parks – that's more than most countries.*
- *Community conservation areas cover about 20% of Namibia and embrace around 195,000 people.*
- *Tourism concessions in parks provide important income for neighbouring communities, promoting conservation.*
- *Wildlife conservation outside parks must be seen as wildlife management for the benefit of the people – not wildlife preservation for the benefit of an urban ideal.*
- *Rural people need the land to survive – for livestock herding, for crop production and for wildlife management.*
- *Wildlife management outside parks is an economic activity – just like farming – otherwise wildlife will be pushed out by land uses that generate better returns from the same land at lower costs.*
- *Photographic tourism is an ideal use of intact ecosystems with healthy wildlife populations, but can only be practiced in accessible areas with enough scenic interest and/or high wildlife densities – this leaves large areas without tourism value or income.*
- *Conservation hunting funds community conservation structures – including 83 communal conservancies and around 584 community game guards and resource monitors.*
- *Conservation hunting funds anti-poaching activities by government agencies, community conservation organisations and private sector initiatives.*

Don't confuse farmland with national parks!

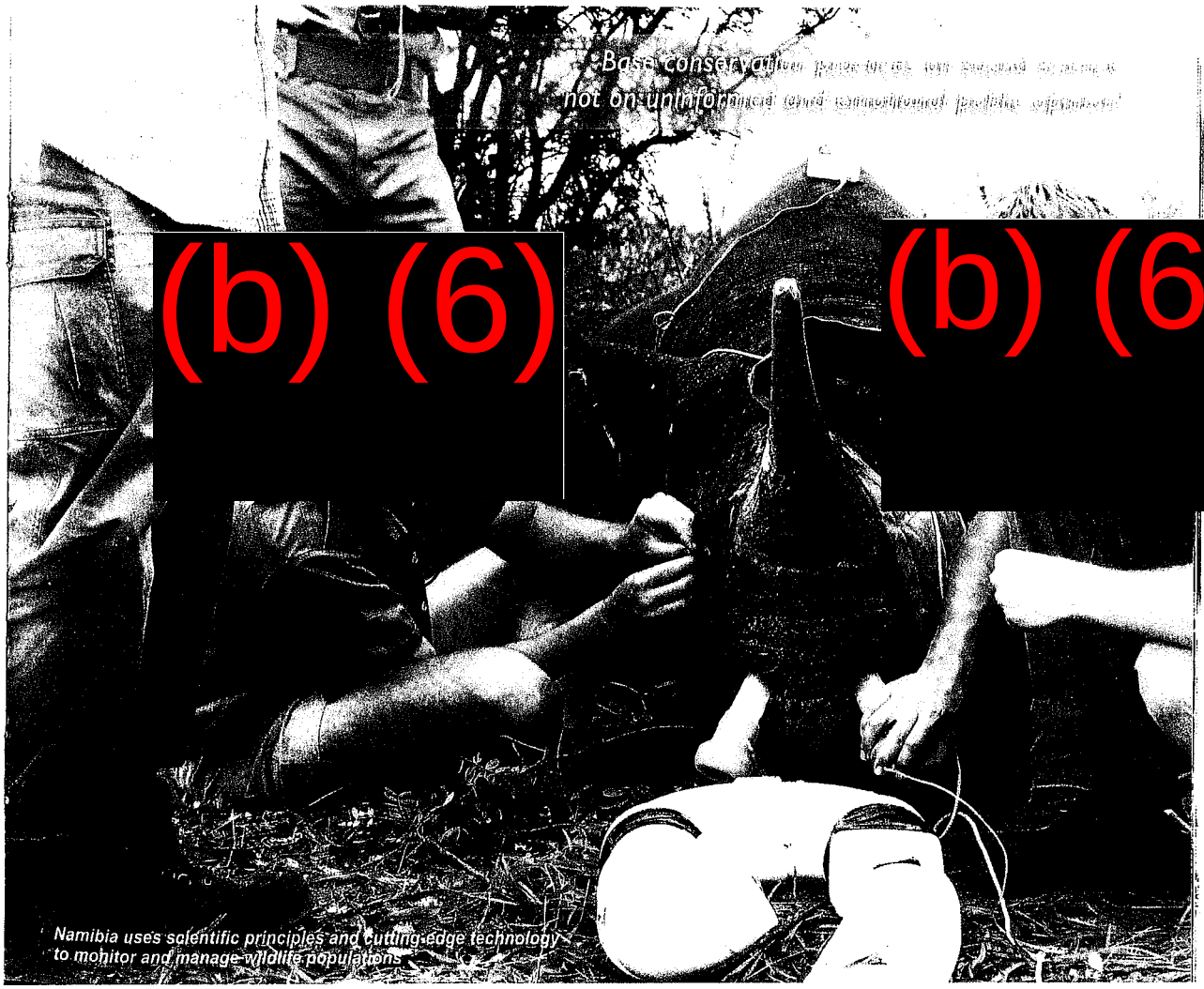
Namibia balances wildlife management outside parks with other land uses such as livestock herding and crop production

Namibia's conservation success is based on science and proof!

Namibia has one of the most intensive wildlife monitoring and utilisation control systems in Africa and the world:

Namibia uses a variety of systems to monitor and manage wildlife populations. The systems differ between national parks, community conservation areas and private farmland and are tailored to meet local needs. Management is by no means perfect in all areas or at all times. Yet the general approach of actively using wildlife outside parks for the benefit of rural communities has proven to be very successful, enabling healthy wildlife populations and strengthening local livelihoods. Namibia's dynamic conservation community ensures that environmental concerns are publicly recognised. While a balance between economic development and conservation in rural Africa is often problematic, most stakeholders strive to address issues. Collaboration between government, local communities, support NGOs and the private sector is a key to Namibia's conservation success.

- *No one approach or system is perfect. The flexibility to adapt to changing needs and circumstances is more important than any one system or approach.*
- *Namibia has excellent knowledge of its wildlife populations through ongoing research and regular, rigorous monitoring activities and systems, including aerial surveys, road counts, foot patrols and remote wildlife tracking using cutting-edge technology.*
- *The Ministry of Environment and Tourism has clear compliance requirements for wildlife management*
- *Stringent monitoring and control systems for all wildlife harvesting facilitate effective management and minimise misuse.*
- *Offtakes are carried out according to annual quotas based on sustainable harvest rates and are controlled through permits and reporting requirements.*
- *The effects of offtakes over time are monitored and harvest rates are adapted to keep populations healthy if population changes occur.*
- *Regular quota revisions for wildlife harvesting are based on monitoring data and scientific guidelines.*
- *Land use objectives differ between national parks, community conservation areas and private farmland, resulting in varying wildlife densities in different areas.*
- *Challenges are a part of wildlife management, especially when attempting to balance the needs of large, dangerous wildlife with the needs of poor rural communities.*
- *Increasing human-wildlife conflict is a result of increasing game numbers and a sign of successful conservation; it is also one of the biggest challenges for wildlife management outside parks.*
- *Wildlife in open, unfenced systems is free to roam and is susceptible to drought and disease, resulting in natural population fluctuations.*
- *Continually adapting activities to changing circumstances facilitates sustainability.*



Namibia uses scientific principles and cutting-edge technology to monitor and manage wildlife populations

Sustainable wildlife harvesting promotes conservation!

What exactly is sustainable wildlife harvesting?

Sustainable wildlife harvesting means harvesting a limited percentage of wildlife stocks without compromising the health of the overall population, in order to generate income for local communities and enable wildlife management as a viable land use. When this is legally-entrenched, well-controlled and based on scientific principles and sound knowledge, it is fully sustainable.

Wildlife harvesting has been a natural factor controlling game populations throughout human evolution, just like the impact of lions and other predators.

Sustainable wildlife harvesting...

- *Is carried out by local land holders.*
- *Creates incentives to keep wildlife on the land.*
- *Keeps natural habitats intact.*
- *Provides alternative income and strengthens rural livelihoods, especially in remote, arid environments.*
- *Enables a mix of land uses including livestock and cropping.*
- *Strengthens resilience against impacts from climate change.*
- *Strengthens resilience against external economic or political influences and reduces dependency on agriculture.*
- *Pays for conservation structures and anti-poaching activities.*
- *Provides meat for rural communities.*
- *Ensures stakeholders have a real interest in conserving wildlife.*
- *Reinforces traditional cultural values related to wildlife.*
- *Safeguards indigenous knowledge about wildlife.*

Sustainable wildlife harvesting includes these activities:

- *Conservation hunting (hunting with clear conservation outcomes targeting a very small percentage of the total population).*
- *Meat harvesting (using minimum-impact methods and offtake rates well below natural population growth rates).*
- *Live capture and sale (moving surplus animals from high density areas to low density areas within their natural range).*

What exactly is conservation hunting?

Conservation hunting consists of harvesting small numbers of indigenous wildlife as part of a personal wilderness experience based on traditional human survival skills. Conservation fishing harvests indigenous fish according to the same principles. These activities have verifiable prerequisites and outcomes (see opposite page) while focussing on wilderness experiences and participation in natural dynamics through regenerative pursuits. They can be combined under the term wildernessing and promote the protection of free-roaming indigenous species in their natural habitat.

The Namibian conservation hunting fraternity adheres to guidelines for ethical hunting, including:

- *Stalking game in natural habitat to ensure a wilderness experience and fair chase.*
- *Ensuring minimum suffering for hunted animals.*
- *Targeting mature animals that can be harvested without negative impacts on the overall population.*
- *Ensuring that all meat and other products of all hunted animals are used.*
- *Hunting predators in an ethical manner only as part of predator management.*

Down to confines conservation hunting and ethics sustainable wildlife harvesting with protecting or bred trophy shooting practices.

CONSERVATION HUNTING HAS THE FOLLOWING VERIFIABLE PREREQUISITES AND OUTCOMES:

1. It is governed by a national legal framework with clear systems of controls and reporting requirements.
2. It meets all CITES and IUCN species conservation criteria.
3. It targets only free-roaming, indigenous species in natural habitats large enough to ensure healthy population dynamics.
4. Wildlife population trends in the greater landscape are closely monitored and offtakes are adapted as needed to ensure the population health of all targeted species.
5. Offtakes are sustainable, based on species-specific, scientifically-accepted annual quotas for the hunted population.
6. It promotes the natural diversity of all indigenous fauna and flora in the hunting area.
7. It safeguards wildlife habitat (the hunting area) against destructive land uses.
8. A major portion of generated income goes back to the land holders and is spent on the conservation and human development needs of the hunting area.
9. It employs local people to carry out conservation activities in the hunting area, including wildlife monitoring and anti-poaching activities.
10. It mitigates human-wildlife conflict amongst local communities if these occur in, or adjacent to, the hunting area.

Through these criteria, conservation hunting creates clear incentives to adopt wildlife management as a land use.

Conservation hunting promotes the protection of free-roaming, indigenous wildlife and its natural habitat

Habitat loss and crime are the biggest killers of wildlife!

WILDLIFE PRESERVATION WITHOUT HABITAT CONSERVATION IS MEANINGLESS!

Land conversion and resultant habitat loss is mostly overlooked by the public, but is the biggest killer of wildlife!

Wildlife needs large areas of intact habitat to ensure healthy populations:

- *Most game needs undisturbed access to water, which it does not have if pressure by people, their livestock or their dogs is too high.*
- *Many species need to be able to roam widely in search of food, especially in areas with highly variable rainfall; fences, roads, settlements and other infrastructure all fragment habitat and inhibit the ability of wildlife to respond to seasonal food availability.*
- *Wild animals need shelter to which they can retreat when chased by natural predators or disturbed by people.*
- *Game needs large enough areas to engage in natural interactions, especially breeding and rearing of young.*
- *Wildlife can coexist with livestock, but is often eradicated by farmers who see it as grazing competition or a threat to infrastructure or safety.*
- *Wildlife is not tolerated in crop fields or gardens; effective zoning of crops into land use mosaics can leave adjacent wildlife habitats intact.*

PEOPLE ONLY MAKE THE EFFORT TO KEEP WILDLIFE HABITATS INTACT IF THEY HAVE A TANGIBLE INCENTIVE TO DO THIS.

POACHING AND UNCONTROLLED EXPLOITATION DECIMATE WILDLIFE!

Poaching and uncontrolled exploitation should never be confused with legal, sustainable wildlife harvesting!

Poaching...

- *Is stealing from the rightful owners – the local communities.*
- *Steals valuable wildlife products for sale in other areas or other countries.*
- *Takes the wildlife value out of the country and provides no local income or benefits.*
- *Undermines conservation activities and harms the resource base.*
- *Undermines tourism and other legal wildlife uses.*
- *Has a severe impact on high value species.*

Uncontrolled exploitation...

- *Places immediate financial gain over sustainability*
- *Abuses legal loopholes to exploit resources.*
- *Takes advantage of weak control mechanisms.*
- *Relies on weak governance and corruption.*
- *Benefits only a small number of individuals.*
- *Undermines conservation activities and harms the resource base.*
- *Undermines tourism and other legal wildlife uses.*
- *Is not sustainable.*

COMMERCIAL POACHING, ESPECIALLY OF RHINOS AND ELEPHANTS, IS A HUGE THREAT TO NAMIBIA'S VALUABLE WILDLIFE AND TO A VARIETY OF INDUSTRIES BASED ON IT.

Greed and misguided emotions undermine effective conservation!

TROPHY BREEDING AND SHOOTING DISCREDITS ALL SUSTAINABLE WILDLIFE HARVESTING!

Trophy shooting activities motivated only by financial gain should not be confused with conservation hunting!

These and similar practices make no conservation contributions and are not part of conservation hunting:

- *Canned shooting (shooting animals in small enclosures).*
- *Put-and-take shooting (releasing captured trophy animals for the sole purpose of shooting them).*
- *Breeding lions and other predators for trophy shooting.*
- *Breeding rarities such as black springbok, golden oryx etc. for the trophy trade.*
- *Introducing exotic species such as blesbok, nyala etc. for trophy shooting.*
- *Unethical shooting of animals based only on their trophies (rather than fair chase hunting based on a wilderness experience).*
- *Genetic manipulation of the gene pools of species to enhance trophy quality.*

GAME USE MUST BE ABLE TO PROVE CONSERVATION OUTCOMES TO BE ACCEPTED AS A VIABLE CONSERVATION ACTIVITY

EMOTIONAL ANTI-HUNTING CAMPAIGNS UNDERMINE CONSERVATION!

Anti-hunting campaigns based on emotional opinions should not derail proven conservation approaches!

In a modern world of inter-connectivity, social media and concerned global citizens, well-meaning but at times misguided international opinion and pressure don't always bring positive change – they also have the ability to influence and change legitimate local activities for the worse. Local communities and environments are often the worst-affected.

- *Calls for a hunting ban in Namibia are based on urban values and opinions, not on rural conditions and needs, and are often orchestrated by animal welfare organisations and misguided followers.*
- *A small, economically secure urban elite is challenging legal and highly beneficial activities in Africa from an idealistic moral standpoint.*
- *A hunting ban dispossesses and disempowers local decision-making and enforces a foreign moral view upon Africans.*
- *A hunting ban would have the most negative impacts on the elements that the international public is attempting to support – wildlife populations and local people outside national parks.*
- *In-depth understanding of wildlife dynamics, based on scientific principles, should not be dismissed by emotional, misguided external public opinions.*

NAMIBIA'S WELL-DOCUMENTED, SUCCESSFUL APPROACH TO CONSERVATION SHOULD NOT BE JEOPARDISED BY OUTSIDERS

African wildlife: use it – or lose it!

What would be lost, if wildlife could not be used to generate income for local communities outside parks?

Hunting bans, which could consist either of Namibia stopping the activity of hunting, or of other countries stopping the import of hunting authentica – thereby closing the market – would have detrimental effects for wildlife outside parks, and for people currently benefitting from that wildlife.

- *The loss of income to the national economy is currently not quantified, but is likely to be over a billion Namibia Dollars.*
- *A hunting ban would result in at least N$ 43 million of lost annual returns for conservancies if all wildlife harvesting were banned, and would have a direct impact on at least 55 of the 62 conservancies currently generating returns from natural resources.*
- *Loss of conservation hunting income would result in at least 32 conservancies becoming financially unsustainable.*
- *If no immediate alternative income streams could be secured, a large percentage of the currently 584 community game guards and resource monitors employed in conservancies across Namibia would stand to lose their jobs.*
- *The loss of natural resource management structures would have immediate negative effects on wildlife populations and the health of other natural resource stocks.*
- *The loss of community game guards would significantly reduce Namibia's ability to combat poaching, especially of free-roaming rhino and elephant.*
- *Discontinuing regular wildlife monitoring and annual game counts would seriously undermine effective wildlife management.*
- *The loss of natural resource returns for local communities would result in an immediate reduction in people's tolerance of problematic wildlife such as elephants, lions and other predators.*
- *Reduced tolerance of wildlife would lead to an increase in retaliatory killing of problematic animals.*
- *A reduced sense of ownership over wildlife would lead to increased bush-meat poaching as well as poaching of high-value species.*
- *Across much of the currently 165,182 square kilometres of community conservation area, wildlife would no longer be considered a land-use priority and would be displaced by other uses such as livestock.*
- *On a large percentage of freehold farms with limited or no tourism potential, wildlife would also be displaced.*

MOST LARGER WILDLIFE SPECIES WOULD BE DISPLACED FROM MUCH OF NAMIBIA IF THEY COULD NOT BE USED TO GENERATE INCOME

Using wildlife ensures its value for land holders and KEEPS IT ON THE LAND!

The economic value of wildlife creates the incentive for land holders to include wildlife as a land use. If wildlife is not used, but preserved only for its own sake, it has little place outside parks, because land outside parks is used to generate rural livelihoods and contribute to the national economy.

- *Eat game meat to keep wildlife on the land – eat beef, and put more cattle on the land.*
- *Harvesting sustainable numbers of wildlife keeps overall populations healthy and avoids over-stocking.*
- *Conservation hunting promotes wildlife conservation and habitat protection.*

Don't confuse wildlife use
with wildlife loss!
without generating benefits, they will be eradicated.

Further information resources:

Community conservation in Namibia:
(especially the annual Community Conservation Report)
State protected areas in Namibia:
International wildlife trade regulations:
International biodiversity conservation -

Ministry of Environment & Tourism

Namibian Association of CBNRM Support Organisations

The Namibian Association of CBNRM Support Organisations (NACSO) embraces a variety of NGOs and individual members, who provide a range of technical and funding support to community conservation. Three NACSO working groups, namely the **Natural Resources Working Group** (NRWG), the **Business, Enterprises and Livelihoods Working Group** (BELWG) and the **Institutional Development Working Group** (IDWG), facilitate coordinated service provision to rural communities. More information:

Pro - forma Invoice

HUNTAFRICA NAMIBIA SAFARIS

HUNTAFRICA NAMIBIA cc

PO Box 1100
Gobabis
Namibia

Tel / Fax +264 62 56 3700
Mobile +264 81 124 3299

Email: info@huntafrica.com.na
Internet: www.huntafrica.com.na
VAT Reg 2548664-01-5

DATE	P-INV
10.04.2019	2019/03

INVOICE TO:
Don Robbilard
2019 Hunt

DAILY FEES	DAILY RATES (US$)	CLIENTS #	DAYS #		TOTAL (US$)
Elephant	3,252.35	1	14		45,532.90
Buffalo	1,217.14	1	7		8,519.98
(2nd Animal-40% Discount on daily fee=14140-40%)					-
* 15% discount on total daily fees					-8,108.00
TOTAL Daily Fees (15% VAT Applicable - Not included)					45,944.88

TROPHY FEES	TROPHY FEES (US$)	TROPHIES #		TOTAL (US$)
Hunt Dates: 8 June - 3 July 2019				
Elephant	42,446	1		42,446.00
(Tusks 80lb < additional trophy fee)	6,500			not included
Buffalo	21,830	1		21,830.00
Roan	22,785	1		22,785.00
* 15% discount on total trophy fees				-13,059.00
TOTAL Trophy Fees				74,002.00

OTHER FFES	TOTAL (US$)
West Air - Charter flight 8 June 2019 - NAD excl 51840 roe 14.43 - 18.03.2019	3,593.00
TOTAL Other Fees (15% VAT Applicable - Not included)	3,593.00

VAT - (PAYABLE ONLY AT END OF HUNT - NOT TAKEN INTO ACCOUNT FOR DEPOSIT)		7,430.68
TOTAL	US$	130,970.56

DEPOSIT PAID (US$)	18.08.2017	US$	59,973.00
PAYMENT (US$)	02.04.2019	US$	70,998.00
BALANCE (US$)		US$	-0.44

BANK DETAILS:

Standard Bank Namibia
PO Box 32
Gobabis
Namibia, Africa

(b) (6)

Hunting fees include:

1. All basic safari fees. (accommodation, food, all drinks - house brands, vehicle)
2. Hunting permits for Namibia
3. Trained African skinners and trackers
4. Field preparation of trophies

Hunting fees exclude:

1. Taxidermist charges
2. Dipping and mounting of trophies
3. Freight agent's packing and shipping
4. Rifle hire and ammunition
5. African Staff Tips (Gratuities)
6. 15% VAT on accomodation

Special Notes:

1. All wounded game not found will be regarded as hunted
2. We require a 50% deposit to confirm the booking of a hunt
3. Final payment - wire transfer or cash

MINISTRY OF ENVIRONMENT AND TOURISM	PERMIT No.:	186436
Directorate: Scientific Services Private Bag 13306 Windhoek, Namibia Telephone: Permit Office Tel: +264-61-284 2539/2565	VALID FROM:	[illegible]
	VALID TO:	[illegible]
	RECEIPT No.:	[illegible]

PERMIT TO HUNT FOR TROPHIES

Pursuant to authority granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975):

Name of Trophy Hunter: [illegible]

Permanent Address:

Country: USA

is hereby granted permission to hunt the specified number of animals for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Baboon		Impala Common	2	Springbok		Other:	
Buffalo	1	Klipspringer		Steenbok		[illegible]	
Caracal		Kudu	1	Warthog			
Duiker		Leopard		Waterbuck			
Eland		Oryx (Gemsbok)		Wildebeest, Black			
Hartebeest	1	Ostrich		Wildebeest, Blue			
Jackal		Reedbuck	2	Zebra, Burchell's			
Grey Duiker		Rhinoceros, Black		Zebra, Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan	1	Leopard			
Impala Black-Faced		Sable	1	Lion			

On the following terms, conditions, restrictions and/or special requirements: [illegible]

Guided by (name of guide): [illegible]

[illegible]

Official MET date stamp

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

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

June 27, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine - Namibia
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-Mail; Amy_Brisendine@FWS.gov

RE: PRT # MA42218D – Applicant - Donald Robillard, Jr.
Supplement to Import Permit Application for Sport Hunted Elephant Trophy from Namibia

Ms. Brisendine:

This is a supplement to the existing application, PRT # MA42218D for an Elephant Trophy Import from Namibia for applicant Don Robillard, Jr.

Supplementary Answers for after the Hunt detailed below:

Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or huntingblock, AND nearest city) where wildlife was removed from the wild:

The elephant was taken in the Republic of Namibia, Kavango East Bwabwata West. Precise location of the hunt – S 18 04.507 E 021 35.199

Date wildlife was hunted

The Wildlife was taken on June 15th, 2019.

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

The trophies are currently stored at Trophaendienste Taxidermey, P.O. box 21068, Windhoek, Republic of Namibia. Professional Hunter – Jacobus Hugo Pinaar, Hunt Africa Namibia, P.O. Box 1100, Gobabis, Omaheke, Namibia.

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 for Hunting Permits

We have also provided the Operator Enhancement Report from Hunt Africa Namibia and the invoice for this hunt with trophy fees listed, which we ask to be included with the other enhancement documentation and in response

to question #9 of the application. In addition, we are supplying the document "Keep Namibia's wildlife on the land!" for further enhancement documentation to supplement this import permit application.

Please reference these documents and the many others provided by Conservation Force, the Namibian government, and other hunters in making a positive enhancement finding for this elephant import permit application.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. Don Robillard w/attachments

Enclosures:
a. Operator Enhancement Report- Hunt Africa Namibia
b. Donald Robillard Hunting Permits-2019
c. Invoice for hunt with trophy fees-2019
d. Keep Namibia's wildlife on the land!

OPERATOR ENHANCEMENT QUESTIONNAIRE

1. **OPERATOR INFORMATION**
   a. Name of Area Operator: HUNTAFRICA NAMIBIA
   b. Years in business: 32 years
   c. Name of Company conductinghunt: HUNTAFRICA NAMIBIA
   d. City where hunt will take place:
   e. Country where hunt will take place: NAMIBIA

2. **CONCESSION**
   a. Name of Concession: Bwabwata west National park
   b. Area in Km^2: 3800
   c. Land tenure: Government lease
      Government Lease x Community Private Ranch Private Conservancy
   d. Length of Concession Agreement: 5 years
   e. Can it be renewed? x Yes No
   f. Length of Renewal, if applicable: 5 years
   g. Estimated total amount received in trophy fees last year, if applicable:
   h. Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:
      Yes, annual reporting: detailed report to the Ministry of Environment & Tourism, of each client and every animal that was hunted.
   i. Please provide the Concession location and nearest City: S 18 09°C 162 E 021 42°C 495, Rundu (bigger town) Divundu (very small town)
   j. Please attach a map or maps with the boundaries marked and showing the nearest City attached
   k. If the Concession borders a National Park, please provide Park name: Inside the Bwabwata National park
   l. Description of general and distinctive habitat features and any water features:
      Bushveld
      The Okavango river forms the western border

3. **COMMUNITIES IN THE CONCESSION**
   a. Are there any communities living in the Concession? x Yes No
   b. If so, estimated number of people or villages in the Concession? 1 Village – Omega – 1000 people
   c. Are there communities bordering this Concession? x Yes No
   d. If so, estimated number of people or Villages around the Concession?
      Muchiko area – 500 people

4. **RELEVANT GAME POPULATIONS IN THE CONCESSION:**[1]

[1] The new Fish and Wildlife Services (FWS) Import Permit Application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species Name	Relative Abundance			Estimated Population	3-Year Trend			How is it monitored?
	Dense	Avg.	Sparse		Up	Down	Stable	
Elephant	x			2500			x	By counts
Lion			x		x			
Leopard	x						x	
Prey species								

5. Local Community Participation
   a. Total employment number: 40
   b. Please identify the number and type of all employees:

Employee 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:		

6. 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:

Employee 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		
Community Relations Personnel	1		
Others:			

7. Anti-Poaching Efforts:[2]
   a. Number of Anti-Poaching staff:
   b. Are Anti-Poaching Patrols conducted during the hunting season, off-season, or **both?**
      x
      Hunting season: _____ Off-season: _____ **Both seasons:** x

[2] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

c. Months during which Anti-Poaching Patrols are conducted: **All 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 & Tourism

7. **ANTI-POACHING EFFORTS *[CONTINUATION]***

g. Do you offer rewards to poaching informants leading to arrest? **x** Yes _____ No

h. Do you offer rewards to poaching informants upon conviction? _____ Yes **x** No

i. Please describe the company's anti-poaching expenditures below:

TYPE OF EXPENSE	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
SALARIES FOR ANTI-POACHING SCOUTS	N$ 31200	N$ 31200	N$ 31200	
EQUIPMENT				
VEHICLES	4x4 vehicle	4x4 vehicle	4x4 vehicle	
PETROL	As needed	As needed	As needed	
REWARDS PAID				
OTHER: _____				Each person arrested, the informer get N$ 5000 per case
OTHER: _____				
TOTALS				

j. What currency are the expenditures given in? **Namibian Dollar**

8. **ANTI-POACHING RESULTS:**

CATEGORY	2016	2017	2018	REMARKS
POACHING INCIDENTS DISCOVERED				
ELEPHANT CARCASSES OBSERVED				
LION CARCASSES OBSERVED				
LEOPARD CARCASSES OBSERVED				
IVORY POACHERS ARRESTED				
MEAT POACHERS ARRESTED				
OTHER POACHERS ARRESTED				
POACHERS CONVICTED				
SNARES/GIN TRAPS COLLECTED				
FIREARMS CONFISCATED				
VEHICLES CONFISCATED				
BICYCLES CONFISCATED				

BOATS/NETS CONFISCATED				
TUSKS RECOVERED				
OTHER: _____				

9. COMMUNITY INVESTMENT:[3]
   a. Does the Company contribute money or goods/services to local communities?
      x Yes _____ No
   b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
      2,5 Million Namibian Dollars, required by law, required by contract & voluntary contribution
   c. Does the Company provide game meat to nearby communities? **Yes x** No
   d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:
      45 tons of 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.
      N/A
   f. Please describe any consolation payments made to local residents damaged by game species
      N/A
   g. What currency are the expenditures reported in? **Namibian Dollars**

SPECIES	DAMAGE CAUSED	CONSOLATION PAID 2016	CONSOLATION PAID 2017	CONSOLATION PAID 2018
ELEPHANT				
LION				
LEOPARD				
OTHER				

   a. Please describe any community projects paid for by the Company:
   b. What currency are the expenditures reported in? **Namibian Dollars**

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
EDUCATION (E.G.: CLASSROOMS, OFFICES)	**N$ 95000**	**N$ 110000**	**N$ 120 000**	
EDUCATION (E.G.: SCHOOL FEES, SCHOOL SUPPLIES)				
HEALTH (E.G.: CLINICS, OFFICES)				
HEALTH (E.G.: MEDICAL SALARIES, EQUIPMENT)				

[3] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

COMMUNITY SCOUT SALARIES					
OTHER COMMUNITY ANTI-POACHING					

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS	
LOCAL GOVERNMENT ACTIVITIES					
WATER INFRASTRUCTURE IMPROVEMENTS	1 Borehole + water installation N$ 40,000				
SPORTS TEAMS FUNDED	1 team N$ 90,000	1 team N$ 90,000	1 team N$ 90,000		
CONSTRUCTION MATERIALS DONATED	N$ 500,000	N$ 500,000	N$500,000		
OTHER:					
OTHER:					
TOTALS					

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	HUNTING ELEPHANT	HUNTING LION	HUNTING LEOPARD	HUNTING ALL SPECIES	
NUMBER OF U.S. CLIENTS	2016: 6	2016:	2017 2	201	
	2017: 6	2017:	2017: 2	201	
	2018: 6	2018:	2018: 0	201	
PERCENTAGE OF U.S. CLIENTS	2016: 100%	2016:	2016: 100%	201	
	2017: 100%	2017:	2017: 100%	201	
	2018: 100%	2018:	2018:	201	
TROPHY FEES PAID BY U.S. CLIENTS	2016:	2016:	2016:	201	
	2017:	2017:	2017:	201	
	2018:	2018:	2018:	201	

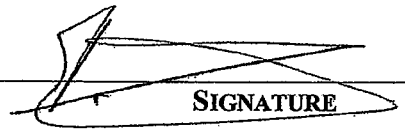
11. Approximate Dollar amount and/or percentage of Company's revenue from U.S. Clients: 90%

12. **OTHER INFORMATION:** Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies (e.g., aging, size, resting areas), Concession Improvements (e.g.: digging and maintaining boreholes, restocking), Management Activities, Research, etc.

Research, Hunting policies and Concession improvements by Ministry of Environment and Tourism

Restocking through Natural breeding

13. I declare that the foregoing is true and correct:



SIGNATURE

TELEPHONE: 00264 61 305767

EMAIL: accounts@tippingpoint.com.na

JW Chapman

PRINT - FULL NAME

Mr.

TITLE

NAMIBIA
ANGOLA
ZAMBIA
BOTSWANA
SOUTH AFRICA
ATLANTIC OCEAN
Bwabwata National Park
Katima Mulilo
The Caprivi
Skeleton Coast Park
Etosha National Park
Tsumeb
Khaudom Game Reserve
Skeleton Coast
Huab Rv
Ugab Rv
Waterberg Plateau Park
Burnt Mountain
National West Coast Recreation Area
Windhoek
Swakopmund
Walvis Bay
Naukluft Mountains
(1973m)
Namib-Naukluft Park
Brukkaros
(1586m)
Central Plateau
Keetmanshoop
Lüderitz
Fish River Canyon National Park
Fish River Canyon
Ai-Ais
0 200 km
0 120 miles

[EXTERNAL] Supplement to Import Permit Application #'s MA90749C and MA42218D - Donald Robillard, Jr.

Aimee Korver <permits@conservationforce.org>

Sun 6/28/2020 5:04 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>; (b) (6) (b) (6)

2 attachments (8 MB)

Supplement2018DonRobillard.#MA90749C.zip; Supplement2019DonRobillard#MA42218D.zip;

Ms. Brisendine,

Please include the attachments provided as supplement to Mr. Donald Robillard's import permit applications # MA90749C (2018) and MA42218D (2019)

Inluded:

-Supplement answers for after the hunt

-Operator Enhancement Reports for Hunt Africa Namibia

-Hunting Permits and Invoices with trophy fees for hunt

-additional enhancement documents

Please let me know that you have received this e-mail and if you have any questions.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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. offiie at JFK Airport allowed the reexport of the Elephant base on circumstances of the shippers Mistake.

Im submitting a new permit to bring this Elephant back into the usa.

Thank You (b) (6) [redacted]

BSFKIA 2nd

03299

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

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Form 3-200-20

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

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)

RCVD MAY 29 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.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
BARBER	MICHAEL	E	

(b) (6) [redacted]

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

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

Section C: All applicants complete address information

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
PRESCOTT	ARIZONA	86303	YAVAPAI	USA

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

(b) (6) [redacted] MIKE BARBER

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
PRESCOTT	ARIZONA	86303	YAVAPAI	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 I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

05/22/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

MIKE BARBER
(b) (6) [redacted]
Prescott Valley AZ 86312

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

Mike Barber (b) (6) [redacted]

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   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
Liwyk van Vuuren
Box 445 Outj. 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: (b) (6) _____ 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 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

2. AUTHORITY-STATUTES
16 USC 1539 (e)

REGULATIONS
50 CFR 17.40 (e)

1. PERMITTEE

MICHAEL E. BARBER
(b) (6)
PRESCOTT VALLEY, AZ 86303
U.S.A.

3. NUMBER
MA04153C-0

4. RENEWABLE	5. MAY COPY
☒ YES ☐ NO	☐ YES ☒ NO

6. EFFECTIVE	7. EXPIRES
09/26/2016	09/25/2017

8. NAME AND TITLE OF PRINCIPAL OFFICER *(If #1 is 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 II export permit issued by the Management Authority of Namibia.

(b) (7)(C)

☒ ADDITIONAL CONDITIONS AND AUTHORIZATIONS ALSO APPLY

12. REPORTING REQUIREMENTS

FOR

ISSUED BY	TITLE
Mary Coglianese	CHIEF, BRANCH OF PERMITS, DMA

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

PERMIT / CERTIFICATE No.

0054879

Original

[X] EXPORT
[ ] RE-EXPORT
[ ] IMPORT
[ ] OTHER:

2. Valid until: 05/06/2018

3. Importer (name and address)
Michael Everett Barber
(b) (6)
AZ 86303
Prescott Valley

3a. Country of import: U S A

4. Exporter / Re-exporter (name,address and country)
Ladewyk Jansen van Vuuren
P. O. BOX 445
Outjo
Namibia

Signature of the applicant

5. Special conditions
Not valid if not certified by the Namibian customs.
Tusks no's: NA 16 0099 11.10 & NA 16 0098 12.00

All imports and exports remain subject to verterinary 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 ENVIROMENT AND TOURISM
Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp No.: 1665393

	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. 2Item	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 ***	
B	7./8. *Loxodonta africana* African elephant	9. 2x ears, 2x feet, 5x skin panels & trunk	10. II W	11. 10Item	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 N			

(b) (7)(C) [redacted]

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only i
** Only for specimens of Appendix-I species bred in captivity or artificially progated for commercial purposes
*** for pre-Convention specimens

13. THIS PERMIT IS ISSUED BY: J Sheph

Windhoek — Place

05/12/2017 — Date

(b) (7)(C) [redacted]

14. EXPORT ENDORSEMENT

15. (b) (7)(C) [redacted]

Block	Quantity
A	2
B	10
C	
D	

Hair — Port of Export / Re-export

13/12/17 — Date

l stamp and title

Namprint: 2308

Original

From: mike barber <(b) (6)
Sent: Friday, October 26, 2018 8:02 PM
To: Meehan, John <(b) (6)
Subject: Elephant cites

[EXTERNAL]

Hi John,

I have not received the cites permit yet, can you check on it?

My mailing address is:

(b) (6)

Prescott Valley Az 86312

Thank You, Mike Barber

From: Villavicencio, Jorge <jorge_villavicencio@fws.gov>
Sent: Monday, October 22, 2018 10:46 AM
To: Meehan, John < (b) (6)
Subject: Re: [EXTERNAL] Prt : MA04153C-0

[EXTERNAL]

From what I see in the system, the person who processed this application and issued the permit, should have mailed it to (b) (6)
(b) (6) Prescott Valley, AZ 86312.

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 Wed, Oct 17, 2018 at 9:30 AM, Meehan, John <(b) (6) > wrote:

> Hi Jorge: Permit has not been received. Can you confirm where it was sent to?
>
> JJ

From: Villavicencio, Jorge <jorge_villavicencio@fws.gov>
Sent: Friday, October 5, 2018 9:29 AM
To: Meehan, John <(b) (6)
Subject: Re: [EXTERNAL] Prt : MA04153C-0

[EXTERNAL]

Dear Mr. Meehan:

I have checked our permit system and it shows that the permit was issued on September 2, 2018 and mailed September 27, 2018.

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 Mon, Oct 1, 2018 at 12:27 PM, Meehan, John <(b) (6) [redacted] wrote:

> Hi Jorge: Just checking to see the status on the below mentioned permit.I had sent down to your attention.
>
> Rgds JJ

From: Meehan, John
Sent: Wednesday, May 9, 2018 6:01 AM
To: Villavicencio, Jorge <jorge_villavicencio@fws.gov>
Subject: Re: [EXTERNAL] Prt : MA04153C-0

Thank you.

JJ

Sent from my iPad

On May 9, 2018, at 5:55 AM, Villavicencio, Jorge <jorge_villavicencio@fws.gov> wrote:

> **[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

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On Tue, May 8, 2018 at 3:44 PM, Meehan, John < (b) (6) [redacted] wrote:

> Hi: Another question.
>
> Shipment related to import permit MA04153C-0 containing elephant arrived after it expired. LE allowed reexport back to Namibia since not hunters fault. Hunter wants to reimport can you please advise which application should be used to reapply to bring in this trophy.
>
> We have all supporting documents showing refused entry and reexport back to Namibia.
>
> Rgds JJ
>
> Best Regards,
>
> John Meehan
>
> Fauna & Flora a Division of MIQ Logistics
>
> 152-31 135th Avenue, Jamaica NY 11434
>
> Direct: (b) (6) [redacted]
>
> Email: [redacted]
>
> Web: https://www.miq.com/contact/global/north-america/Jamaica-new-york/

***** This is an external email. Be careful when responding. *****

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***** This is an external email. Be careful when responding. *****

Barry, Anna <anna_barry@fws.gov>

Michael Barber PRT #93375C

1 message

Barry, Anna <anna_barry@fws.gov> Fri, Nov 2, 2018 at 11:34 AM
To: (b) (6)

Dear Mr. Michael Barber,

I was assigned your application for an Endangered Species Act (ESA) Import permit for the import of an African elephant from Namibia. he following is in response to your request regarding the status of your application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by-application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African elephant and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized.

Because each application now requires an individual finding under the ESA , all application both new ones **and** ones submitted for renewal, cannot be finalized until this review process has been finalized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT *You may have noticed that our* ***application forms expired 5/31/2017****. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Form 3-200-20

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

RCVD 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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Turchin	Martin		

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Palm Beach Gdn	FL	33410	Palm Beach	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the ...bal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—...exempt status as outlined in instructions [50 CFR 13.11(d)].

2. ...that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the ***...bchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and ...owledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

Signa... ...cer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 5/19/18

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.

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

Martin Turchin (b) (6) [redacted]

(b) (6) [redacted]

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

(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, Tshalotsho South, near Tshalotsho Town
· Area 2, S19 23 644 E026 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]:

Matabeland 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: Matabeland 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 chapter of their conservation efforts and community participation 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 leopar[redacted]ar.

Applicant's signature: [redacted] 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).

Site Search...

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	• Mono pump system for water provision. • Water engine parts for Nyanganyuni Line, Sihazela, Nintili, Nyadzi Line. • Borehole engine parts for four villages. • Solar pump water system at Gibixhegu and Gwabazabuya Line, in conjunction with safari operator. • Sihazela Primary School classroom block, in conjunction with safari operator.
2	• Toilets for headman's courtroom. • Engine belts for borehole repairs at Zamazama, Sizanani, Zwananani and Thandanani villages. • Borehole drilled at Kope Line. • Water pump for water provision.

	• Solar pump water system at Dlamini Clinic and Gombalume Primary School Line • Construction of Bhemba Clinic.
3	• Borehole drilled and cased at Nyelesi Village, Mtshwayeli and Ntulula. • Borehole at Mashula and Vulashaba Line. • Fifty chairs for Kapane Secondary School. • Classroom block at Mlevu and Mtshwayeli Primary Schools. • A new school under construction at Ntulula Village. • Re-roofed classroom block at Kapane.
4	• Classroom block at Dibutibu Primary School • A mini weather station was installed at Dibutibu Line, in conjunction with World Wide Fund for Nature (WWF). • Solar pump water system at Dibutibu Business Centre. • Ten sewing machines for Dibutibu Secondary School. • F14 staff cottage at Siphongweni Primary School. • Water storage tank and stand for Dibutibu dip tank.
5	• Building material for classroom block at Sipepa Primary School. • Classroom blocks at Mcetshwa, Jakalasi, and Gwali Primary Schools. • Rehabilitation of ten blair toilets at Jakalasi Primary School. • Mpindo classroom block, in conjunction with safari operator.
6	• School furniture (chairs and desks) for Nkwizhu Primary School for 2 classroom blocks. • Boreholes drilled at Mahlosi, Manyenge, Nkwizhu, Jimila, Tshino Line. • Diesel generator was purchased for Tshino Primary School. • Rehabilitation of Mothers' Waiting Room at Jimila Clinic. • School furniture (50 senior chairs and 25 senior dual desks) for Jimila Secondary Schools. • Tuck shops at Tshino and Zabagwadi Line. • Teachers' cottage at Mahlaba Primary School. • Two classroom blocks at Nkwizhu Primary School.
7	• Lister engine and water tank at Pumula Village. • 7km piped water scheme at Gulalikabili. • Diesel pump engine at Phelandaba Primary School, in conjunction with the safari operator. • Classroom block and teachers cottage re-roofed at Phelela and Mpilo Primary School. • Community Hall and general dealer store constructed at Patalika. • Barrier to ward off elephants away from crop fields was set up at Phelela Line, through GEF/World Bank funded HSBC project.
8	• Tshitatshawa Clinic, 99% complete. Staff cottages roofed. • Borehole installed at Tshitatshawa Clinic. • Fencing of Tshitatshawa Clinic. • Solar pump water system at Folosi Line. • Classroom block and tennis court at Mbiriya Primary School. • Borehole at Mbiriya Primary School.
9	• Building material for construction of the second wing at Jowa Clinic. • Chief Tategulu's court house. • 30 wheelbarrows, 30 shovels and 30 picks for rehabilitation of dams. • Classroom block constructed at Malindi in Ward 9.
10	• F14 staff cottage at Zibalongwe Primary School. • Rehabilitation of classroom block at Zibalongwe Primary School. • Three boreholes at Manganga village, Sikente Secondary School and Mtshina Line. • Maphane community hall. • Sikente Clinic completed.
21	• Five pump minder kits. • Six Lister water pump engines. • 5 000 litre water storage tank.

- 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)

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Cnr Hillside Rd / Glenara Ave South
Harare
Zimbabwe
Phone: +263 (4) 747 422
Email: email@campfirezimbabwe.org

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ZW 20152303 1

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

PARKS & WILDLIFE MANAGEMENT AUTHORITY
WESTERN REGION
SENIOR RANGER OPERATIONS
26 MAY 2015
REGIONAL OFFICE
P.O. BOX 2283, BULAWAYO
TEL: 09-63041/7

Specified officer's signature and date-stamp

Cert. Nº 120217

Name MARTIN TURCHIN (6)

Address PALM BEACH FLORIDA USA

Tusk serial number	ZW 20152303 1
Tusk mass (kg)	24KG
Tusk length (metric)	165cm
Sex	MALE

Authority TRZ 076359

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.

ZW 20152303 2

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

PARKS & WILDLIFE MANAGEMENT AUTHORITY
WESTERN REGION
SENIOR RANGER OPERATIONS
26 MAY 2015
REGIONAL OFFICE
P.O. BOX 2283, BULAWAYO
TEL: 09-63041/7

Specified officer's signature and date-stamp

Cert. Nº 120218

Name MARTIN TURCHIN (6)

Address BEACH GARDENS FLORIDA USA

Tusk serial number	ZW 20152303 2
Tusk mass (kg)	22KG
Tusk length (metric)	165cm
Sex	MALE

Authority TRZ 076359

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.

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:
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Renee Snider

May 24, 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 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^2 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^2 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
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
E: regina.lennox@conservationforce.org

Signed: (b) (6) [redacted]

Name: MILTON KARL EVANS

Date: 4/28/18

Form 3-200-20

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

RCVD JUN 01 2018

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

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Evans	Milton	Karl	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Waxahachie	Texas	75165	Ellis	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Waxahachie	Texas	75165	Ellis	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)

(b) (6) 05/10/2018

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.

Same as on page 1

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

Milton Karl 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: _(b) (6)_____ Date: 5/10/18

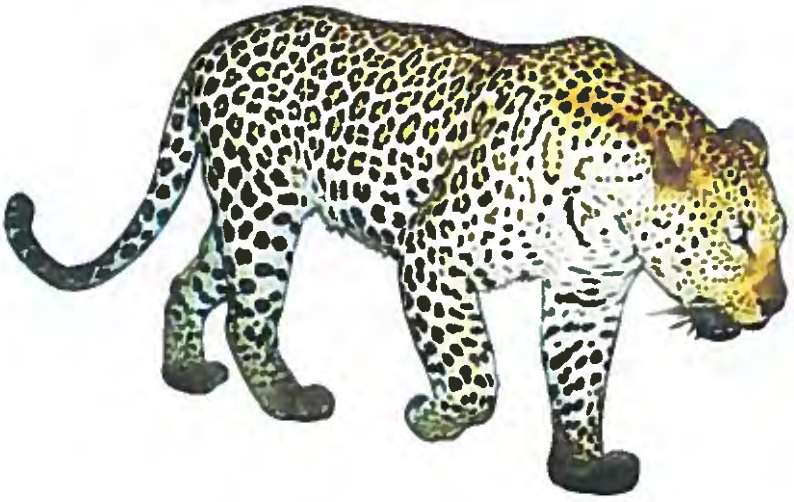
    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain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

End of year 2017

Dear Friends,

Thank you all so much for your unwavering support. DAPU has continued to build and evolve consistently throughout 2017. Total recorded snare yields, elephant poaching and illegal netting for the year 2017 are the lowest since the inception of DAPU. To be precise, since 2014 snaring has been reduced by 70% and poached elephants by 66%. We have recorded poached elephants since 2010, and whilst our 2010 and 2011 numbers are not perfectly accurate .... Elephant poaching has been reduced by 92% or from a high of 40 lost in 2010 and a low of 3 lost in 2017.

We are now in the wet season, and rainfall has been scarce and late. Unfortunately that means unless we get good late rains, then 2018 could be a busy year for DAPU simply because local villagers could be very hungry indeed.

We have continued to meticulously document all of our support, deployments, wins and losses and here we share a summary with everyone who so graciously and generously supported all of our efforts both financially and in kind. As we grow from strength to strength we look forward to your continued support.

With Regards,

Myles E. McCallum
James D. Charlton
Charles Ndondo

Harare, Zimbabwe
10th January 2018

visit us at www.dapuzim.com

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1. Changes

As mentioned in previous reports, we have added Peter Solomon and Owen Zviwanza 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 know 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 ***

visit us at www.dapuzim.com

4. The dry season.
Fires, Water, and Poaching

As I am sure most of you are aware, the 2017 rainy season was very kind indeed – in fact one of the best on record. So much so, that we had to get an extension to allow early burning a month late than normal. So luckily we had lots of water all year in Dande North. The East almost made it all year but not quite. DAPU patrols successfully patrolled the big water sources as often as possible to keep on top of the snaring.

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.

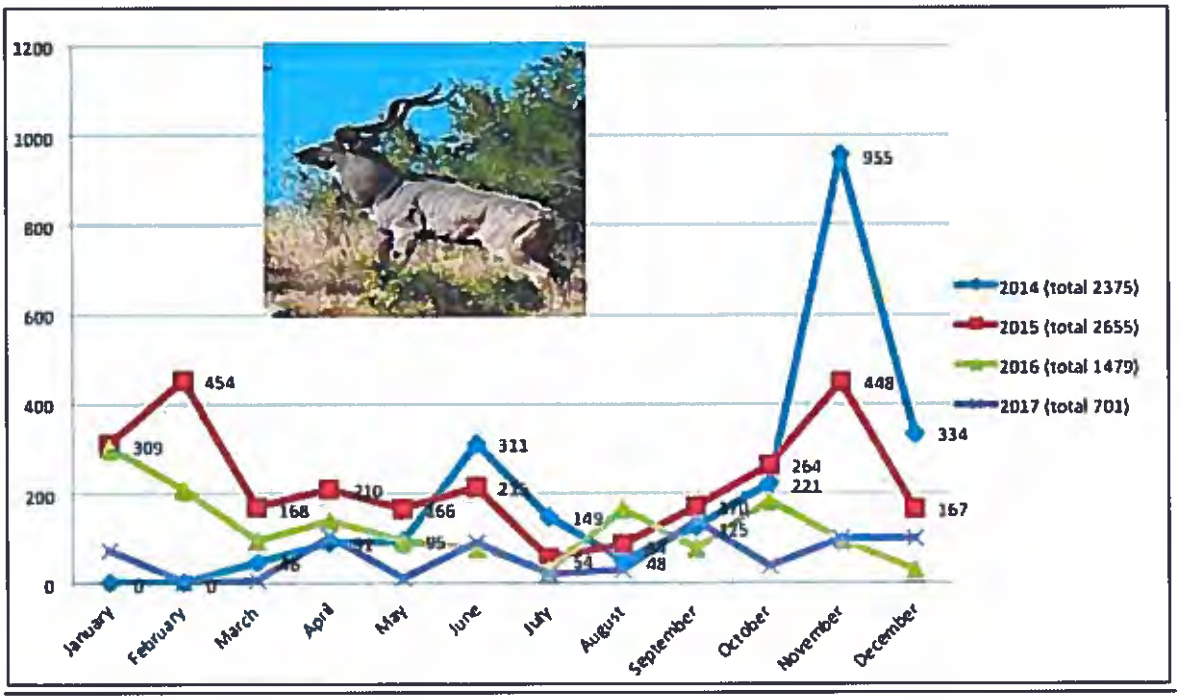
Month	No. of snares	Dogs shot	Meat Poachers convicted	Elephant poachers	Weapons retrieved	Rewards paid
January	71	0	3	0	2	US$784
February	0	0	1	0	0	US$150
March	7	0	0	0	0	US$19
April	103	0	0	0	0	US$133
	181	0	4	0	2	US$1,086.00
May	9	0	0	0	0	US$9
June	89	0	2	0	0	US$118
July	19	1	2	0	0	US$439
August	30	0	0	0	1	US$48
	147	1	4	0	1	US$614
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
	373	0	0	5	4	US$2,969
Total YTD	701	1	8	5	7	US$4,669

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
	740	0	4	2	2	US$2,217
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
	360	1	5	0	6	US$1,714
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
	379	0	3	0	2	US$1,518
Total YTD	1479	1	12	2	10	US$5,449

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

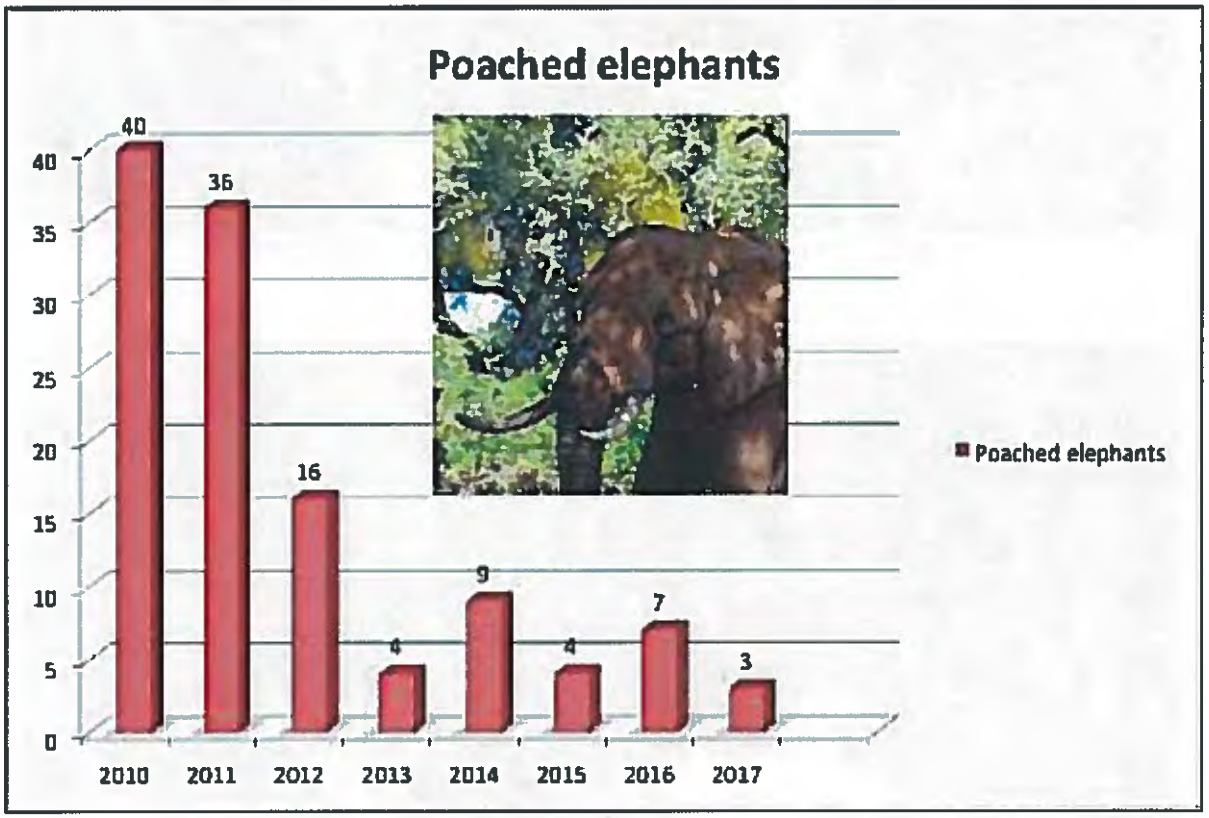


5.Elephant poaching

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 Irira 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.

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****

**** 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.****

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.

*** Skin and bones***

*** This picture clearly shows the tooth wear –she is an old cat***

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.

***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

*** 3200m of piping and solar pump installation Dande East, October 2018***

10. Conservation Force

We continue to work hand in hand with John and Chrissie Jackson of Conservation Force. John and Chrissie are proud hunters and legends in the fight for our way of life and the wild places that we all love.

Conservation Force is a registered non – profit 501(c)(3) public foundation.

How to make a Tax Deductible donation.

Please make a check out to:
Conservation Force

Mail to:
C/O John J. Jackson,III
3240 S. 1-10 SERVICE ROAD W.
SUITE 200, METAIRIE,
LOUISIANA 70001
USA

Check Ref: DAPU

Conservation Force Contact:
JOHN J. JACKSON,III
TEL:(504) 837 - 1233
FAX:(504) 837 – 1145
Email: Jjw-no@att.net
Website: www.conservationforce.org

11. Flying for wildlife and others.

We must extend our thanks to:

1. Flying for Wildlife for their aerial patrols that are conducted on request. These are volunteer pilots in their own machines and they help us at NO cost to DAPU, which is tremendous.

3. Pieter Gertenbach and Charl Grobelar – farmers in the Harare area that are always helping out with mealie meal, fertilizers, soap and other ration items. We use this to supplement the DAPU rations and it is always very well received by the DAPU teams!

4. Trackit (Richard Tennant and Hannes Scholtz) who provide free, real time satellite monitoring of the two DAPU vehicles. This has really saved significantly on fuel and vehicle costs. Also of course we have been able to be much smarter with servicing, and positioning of vehicles.

12. DAPU Income and Expenses 2017

Income	
Bob Schofield	US$100
Burton Foundation	US$2,000
Communites Foundation of Oklahoma	US$2,000
David Adams	US$5,000
David Maple	US$500
DSCF.	US$24,000
Jeff Butterfield	US$250
Jeff Haulbrook	US$2,680
Jerry Beardmore	US$500
Jerry Jurena	US$600
Johnathan Frist	US$4,000
Jytte Merjtsensen	US$2,750
Martinus van der Linden	US$200
Mike Core	US$1,000
Morning Charitable Trust	US$500
Myron Repka	US$2,880
Sylvarnus Charitable Trust	US$6,000
	US$54,960
2017 Hunting clients levies and contributions.	***US$13,116***
Charlton McCallum Safaris	***US$45,540***
Total Income	***US$113,616***

Expenses

 # 1 Wages, rewards and rations.

	Game Scouts	Management Bongi, Muno Alfa & Owen.	Rations	Rewards	Fish poaching (ZAPP)	Total
January	US$1,100	US$1,605	US$770	US$784	US$250	US$4,509
February	US$1,100	US$1,605	US$770	US$150	US$250	US$3,875
March	US$1,100	US$1,605	US$770	US$19	US$250	US$3,744
April	US$1,100	US$1,605	US$770	US$133	US$250	US$3,858
May	US$1,100	US$1,605	US$910	US$9	US$250	US$3,874
June	US$1,100	US$1,605	US$910	US$118	US$250	US$3,983
July	US$1,100	US$1,605	US$910	US$439	US$250	US$4,304
August	US$1,100	US$1,605	US$910	US$48	US$250	US$3,913
September	US$1,100	US$1,605	US$910	US$1,327	US$250	US$5,192
October	US$1,100	US$1,605	US$910	US$68	US$250	US$3,933
November	US$1,100	US$1,605	US$910	US$1,574	US$250	US$5,439
December	US$1,100	US$1,605	US$910	US$34	US$250	US$3,899
Christmas	US$1,100	US$1,605	US$0	US$0	US$0	US$2,705
	US$14,300	***US$20,865***	***US$10,360***	***US$4,703***	***US$3,000***	***US$53,228***

# 2 2017 DAPU equipment expenses	
Grease Junkey repairs to AAX9832	US$5,000
Burj Auto spares for ABX 7074	US$1,267
MM Auto supplies spares and labour for ABX 7074	US$2,574
LG Harrisons Almguard shotguns x 6	US$3,450
Uniforms	US$2,684.00
Toyota Hilux	US$27,150.00
	US$42,125.00

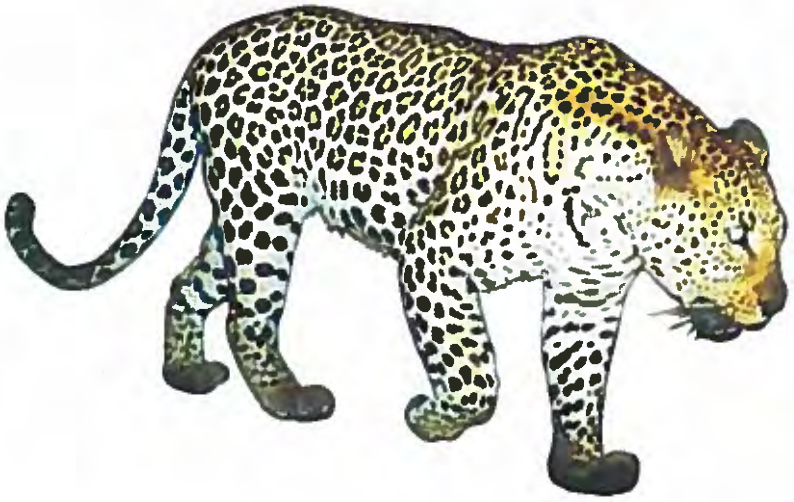
# 3 Vehicles (2).	
AAX 9832 = 17050 km x $0.5 x km	US$8,525
ABX 7074 = 19476 km x $0.5 x km	US$9,738
Total	***US$18,263***

Total expenses		***US$113,616***
Total Income	***US$113,616***	
Shortfall / Credit		***US$0***

DAPU First Period Newsletter 2018

Charlton McCallum Safaris

02 May 2018



DAPU
DANDE ANTI POACHING UNIT

visit us at www.dapuzim.com

Dear Friends,

Thank you all so much for your unwavering support. DAPU has 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
02nd May 2018

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1. Changes

As mentioned in previous reports, we have added Peter Solomon and Owen Zviwanza 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 1st 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 to 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. Utilsiing subtle value and temperature shifts, fine draghtsmanship 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

3. The wet season. "Rain, crops, and poaching"

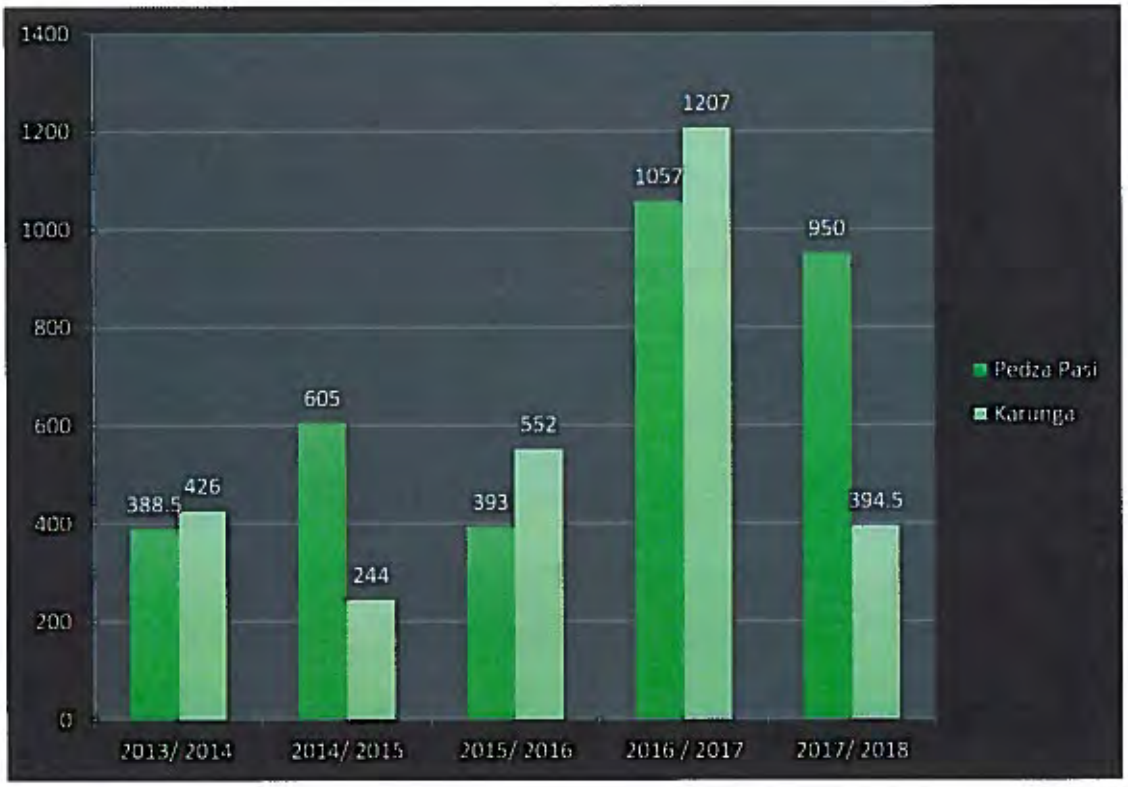
The 2018 rainy season has been erratic and late. The crops – have in general been very poor in Dande, so there is no doubt that we can expect heavy poaching September 2018 – March 2019. There was decent late rain in March and April so there will be a small harvest, but certainly not enough to see families 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.



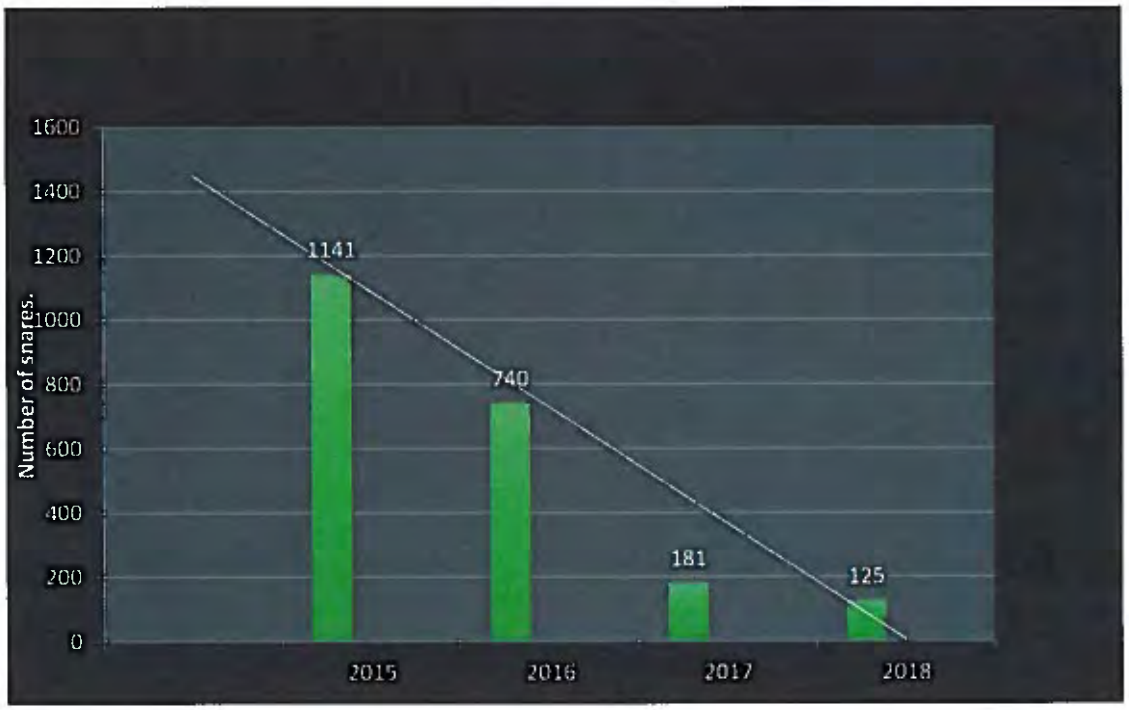
The ward 1 (Kanyemba community) was really hard hit by NO rain until February, followed by floods, so crop loss was close to 100%. They drew down on 2018 hunting proceeds, in order to purchase 30kg of mealie meal for each of the *1,125 families and 33,750kg's was subsequently delivered.* Obviously stories 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:

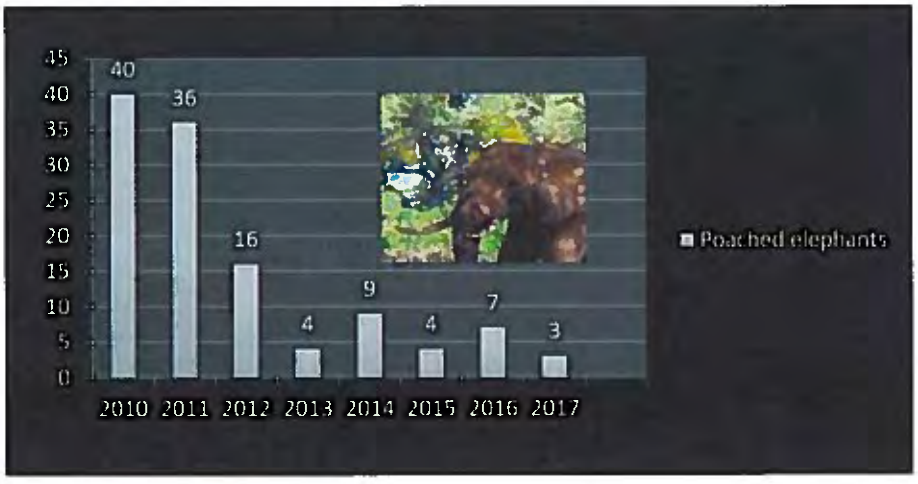
a. DAPU.
b. Buy into our programs from communities.
c. Equitable sharing of income.
d. Government of Zimbabwe.
e. Employment.
f. Meat distribution.

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.



26th 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.

20th 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 alowed.

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!

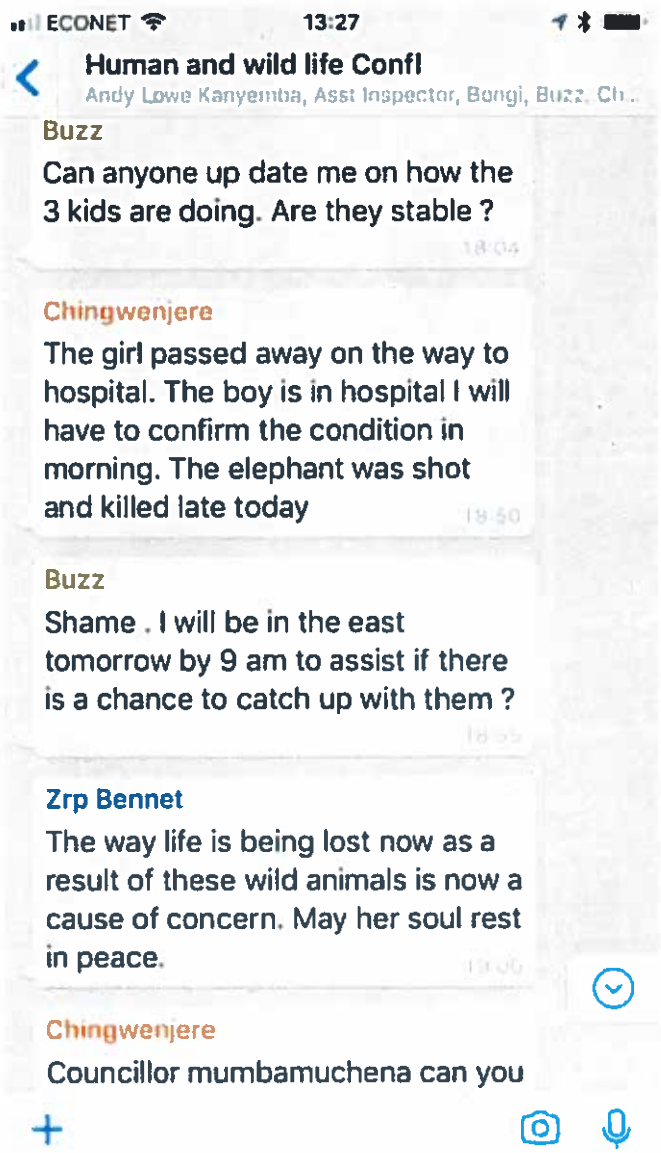
We must compliment the investigations from National Parks - they are doing a fantastic job and poaching has been taken very seriously. It has been a pleasure for DAPU to help in these arrests.

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.

visit us at www.dapuzim.com

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.

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!"

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.

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"

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

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	
Total	**US$8,500**	
Charlton McCallum Safaris	**US$23,035**	
Total Income	**US$31,535**	

2018 Expenses

 # 1 Wages, rewards and rations.

	Game Scouts	Management Bongi Muno & Alfa	Rations	Rewards	Total
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
	US$10,368.26

 # 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
	US$6,159

Total expenses		**US$31,535**
Total Income	**US$31,535**	

September 5, 2019

VIA CERTIFIED MAIL AND EMAIL

LB

David Bernhardt, Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240
exsec@ios.doi.gov

Margaret Everson, Principal Deputy
Director,
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington DC 20240
margaret_everson@fws.gov

Daniel Jorjani, Esquire, Acting Solicitor
Principal Deputy Solicitor
Department of the Interior
1849 C Street, S.W.
Washington, DC 20240
daniel.jorjani@sol.doi.gov

Karen Budd-Falen, Esquire
Deputy Solicitor for Parks and Wildlife
Department of the Interior
1849 C Street, S.W.
Washington, DC 20240
karen.budd-falen@sol.doi.gov

Eric Alvarez
Acting Assistant Director for International Affairs
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington DC 20240
Aeric_alvarez@fws.gov

Director,
Division of International Conservation
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dr. Mary Cogliano, Chief Branch of Permits,
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
mary_cogliano@fws.gov

Re: 60 day notice of intent to sue for failure and refusal to process elephant trophy import permit applications.

Dear Ladies and Gentlemen:

This is a 60-day Notice of Intent to Sue under the Endangered Species Act, 16 U.S.C. Sec. 1531 et seq. ("ESA"), for failure and refusal to process elephant trophy import permit applications in violation of the Administrative Procedures Act, 5 U.S.C Sec. 553 et seq. ("APA"), the Rules and Regulations of the Department implementing the ESA, *see* 50 CFR Part 17, the Special ESA Elephant Regulations, 50 CFR 17.40, regulations implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora, Mar. 3, 1973, 27 U.S.T. 1087 (hereinafter "CITES"), *see* 50 CFR Part 23, and the general permitting regulations of the United States Fish and Wildlife Service ("USF&WS" or "Service"), *see* 50 CFR Part 13.

This notice is on behalf of Dallas Safari Club ("DSC"), their members who desire to engage in trophy sport hunting of African elephants, outstanding elephant trophy import applicants, DSC conservation partners, including Sango Safaris, the Namibia Ministry of Environment and Tourism, the Namibian Association of CBNRM Support Organisations ("NASCO"), and the individual permit applicants set forth on Attachment A to this letter.

The African elephant (*Loxodonta africana*) is listed as threatened under the ESA and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(e)]. The 4(d) special rule lists the requirements for the import of sport-hunted trophies. Under paragraph 17.40(e)(6)(i)(B), for the USF&WS to issue a threatened species permit under 50 CFR 17.32, authorizing the import of a sport-hunted elephant trophy, the Service must make a determination that the killing of the trophy animal will enhance the survival of the species.

Pursuant to the APA, the Service is required to process these permit applications and make a decision on them within a reasonable time. 5 USC 558(c). 50 CFR 13.11 provides

that permit applications will be processed "as soon as possible." And 5 USC 706 provides for judicial review of "agency action unlawfully withheld or unreasonably delayed." Moreover, the delay is denial without appeal in violation of 50 CFR 13.29 or judicial review, *see* APA section 706. The delay also conflicts with the duty the Service has under the ESA to recover the listed species and the enhancement that the permitting would encourage, thus violating 16 U.S.C. 1533(f) and 16 U.S.C. 1540.

A "hold" has been put on the processing of all elephant trophy import permit applications since November 2017 after President Trump issued two "tweets" on 17 and 19 November 2017 on his Twitter account @realDonaldTrump. The effect of this hold following the President's tweets has been to injure conservation efforts designed to protect the African elephant. This hold is further injurious to the people of the countries the elephants inhabit as the local population benefits from controlled sport hunting of elephants, a fact the Service has previously acknowledged.

Although positive enhancement determinations for Zambia and Zimbabwe were made immediately before the "hold" in November 2017, Namibia and the Republic of South Africa enhancement findings were neither new nor disputed. The positive enhancement determination for Zambia had not been suspended. By any standard, the countries of Botswana, Namibia, South Africa, Tanzania, Zambia and Zimbabwe have done nothing to deserve this mistreatment, and breach of treaty, law and regulations. A "tweet" is not a proper rule making. Moreover, this hold has been extended to all elephant trophy imports including from countries where the Service had longstanding positive enhancement findings that were the "gold" standard.

Subsequently, on March 1, 2018[1], the Service issued a memorandum in response to the D.C. Circuit Court's opinion in *Safari Club Intl., v. Zinke*, 878 F.3d 316 (D.C. Cir., 2017) which withdrew enhancement findings, including the enhancement findings for Zambia and Zimbabwe, and stated that

> All of the above referenced findings are no longer effective for making individual permit determinations for imports of those sport-hunted ESA-listed species. However, the Service intends to use the information cited in these findings and contained in its files as appropriate, in addition to the information it receives and has available when it receives each application, to evaluate individual permit applications. The Service is continuing to monitor the status and management of these species in their range countries. At this time, when the Service processes these permit applications, the Service intends to do so on an individual basis, including making ESA enhancement determinations, and CITES non-detriment determinations when required, for each application. The Service intends to grant or deny permits to import a sport-hunted trophy on a case-by-case basis pursuant to its authorities under the ESA and CITES.

[1] https://www.fws.gov/international/pdf/memo-withdrawal-of-certain-findings-ESA-listed-species-sport-hunted-trophies.pdf

> As part of the permitting process, the Service reviews each application received for import of such trophies and evaluates the information provided in the application as well as other information available to the Service as to the status of and management program for the species or population to ensure that the program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized.

This determination was not made as the result of the rule making proceeding ordered by the court in *Safari Club Intl. v. Zinke,* and would appear directly inconsistent with the court's opinion. Nonetheless, despite the statements contained in the Service's March 1, 2018, memorandum, all elephant import permits have remained on "hold." This is true for pre-act elephant trophies and renewal applications for elephant trophy import permits predating the "hold." The Service is not processing elephant import permits on a case by case basis or on any basis whatsoever. This lack of action is contrary to the law and applicable regulations.

The Service is unlawfully employing the "hold" on elephant trophy import permitting to elephant trophy imports from all countries, and even to the simple renewal of elephant import permits and to pre-act elephant trophies. The "hold" has been applied unlawfully to the detriment of the very best and most successful elephant management programs in Africa. The broadly applied "hold "was not a duly noticed and made rule making, was arbitrary, capricious and irrational, and greatly threatens the elephant and range nation programs the ESA and CITES aim to encourage and enhance. Indeed, the "hold" jeopardizes and obstructs years of conservation activities in Southern and a substantial part of Eastern Africa.

Tanzania, Zambia, Zimbabwe, Mozambique, Botswana, Namibia and South Africa hold an estimated 340,000 elephants out of a continental total of 415,000, i.e. 82 per cent of the elephants of Africa. The conservation success of these countries is linked to policies incorporating sustainable use of natural resources, based on science and aiming at improving livelihoods of rural communities while maintaining vast tracts of unspoiled habitat and ecosystems.

The tolerance by the rural citizens of Southern and Eastern Africa of elephants is increased through hunting revenue sharing systems in place throughout the region. The presence of substantial herds of elephants risk serious devastation of the crops on which the rural African population depend. Without the revenue generated by sport trophy hunting, the population would view the elephant more as pests than as a natural resource. Moreover, overpopulation of elephant threatens the habitat of other threatened species. *See* Statement of Sango Safaris, Attachment B.

The "hold' obstructs 70 per cent of the revenue of the Community Conservancy Program in Namibia. All tourist safari hunting of elephant occurs in community

conservancy areas. Likewise the hold obstructs the same percentage of the revenue of the 700,000 families which depend on the CAMPFIRE Program in Zimbabwe. The "hold" undermines the community Wildlife Management Areas in Tanzania that are intended to provide incentivizing livelihoods to rural communities and to act as corridors for elephant and other species between protected areas. The "hold" obstructs the community program in Zambia which largely relies upon tourist safari elephant hunting. The "hold" largely blocks the developing elephant conservation strategy in Botswana that recently has lifted the suspension of tourist safari hunting. Tourist safari elephant hunting had previously been 70 per cent of community revenue in that country.

Therefore, the "hold" is jeopardizing conservation efforts in these countries and threatens the livelihood of more than one million persons and the biodiversity of millions of hectares of pristine wilderness. Without the management and revenues from tourism hunting, these lands are being encroached and converted to agro-pastoral land, leading to the unavoidable extinction of wildlife and natural habitats, and the collapse of ecosystem services.

The successful elephant conservation as well as the control of poaching largely depend upon the sustainable use conservation strategy in the form of elephant tourist safari hunting in each of these countries. The elephant populations and programs in these countries cannot be sustained without the revenue generated by safari hunting and U.S. import of the trophies; hence the "hold" is *the* major threat to the survival of the largest remaining elephant populations in Africa. Hundreds of thousands of elephants are in jeopardy and more than a million families are being deprived of the realization of their single most valuable natural resource because of this illegal "hold."

Finally, tourist safari hunting of elephant is governed by sound administrative systems in all countries that include scientific based quotas supported by CITES non-detriment findings, law enforcement largely funded or carried out by safari hunting operators on the largest share of wild habitat, regulatory permitting, and community-based conservation programs, most of which was supported by over one-hundred million dollars of USAID funding because of its conservation and humanitarian merit.

In conclusion, on behalf of DSC, its members, outstanding elephant trophy import applicants, and DSC conservation partners, and for the reasons stated in this notification, we intend to sue under the Endangered Species Act for failure and refusal to process elephant trophy import permit applications.

Respectfully,

Scott Tobermann
DSC President

13709 Gamma Road, Dallas, TX 75244 * (972) 980-9800 * Fax (972) 980-9925
E-Mail: info@biggame.org * Webpage: www.biggame.org

INDIVIDUALS WITH PERMIT APPLICATIONS PENDING

ATTACHMENT A

PRT #	Last Name	First Name	Area	Date of Hunt	Date of Application
93406C	Evans	Milton Karl	Zimbabwe, Dande North Hunting Concession	5/17-5/30/2018	5/10/2018
84788C	Reeves	Steve	Zimmbabwe, Semore 1 +2 , TTL Campire Ares	April 13-24, 2018	3/7/2018
MA18507C-0	Rogers	Anthony	Zimbabwe, Matabeland South	7/29-8/16, 2017	1/11/2017
MA33591C	Cheek III	Atlas	Zimbabwe, Chewore North Safari Area	7/28/2014	4/18/2017
US58155C	Crippen	Daniel	Zimbabwe, Matetsi Safari Area, Unit 5, Victoria Falls	8/11/2017	9/25/2017
MA57769C-0	Crippen	David	Zimbabwe, Matetsi Safari Area, Unit 5, Victoria Falls	8/20/2017	9/25/2017
033669C/9	Hanson	Arlene & Bob	Zimbabwe, Tsholotsho	9/1/2016 to 9/15/2016	
MA48117D	Weaver	John	Namibia, Zambezi (Caprivi) Region		6/28/2019
83103C	Saulsbury	Mark	Namibia, Nyae-Nyae Conservancy	8/8/2017	3/5/2018
85343C	Ottmers	Bryan	Zimbabwe, Save Valley Conservancy	8/1/2015 to 8/14/2015	3/19/2018
	Pirkle	Mark	Namibia, Shamakuve Concession	9/14/2019 to 10/14/2019	6/20/2019
MA06118C	Easter	Joe (Lane)	Zimbabwe		

Attachment B

STATEMENT OF SANGO SAFARIS OF SAVE VALLEY SAFARIS, ZIMBABWE

Sango Safaris represents a 60,000 hectare property, situated within the Save Valley Conservancy ("SVC") in the South Eastern Lowveld of Zimbabwe.

The annual 2018 aerial survey, carried out every September/October for the past 20 some years showed a population of 665 elephant on Sango last year. As an average in recent years we have from 600 to over 900 elephants on Sango at any given moment. Our ecologically established carrying capacity ranges between 200 to 300 elephants. Therefore, we have at any given moment between 400 to 700 too many elephants on Sango with devastating destruction not only to the food base of the species causing the destruction but with dire consequences for all other plains game animals.

For example the Elephants' destruction as well as decreasing rains have resulted in our zebra and wildebeest herds dropping from 1,500 to 2,000 to around 600 of each species today. Similar numbers are experienced for all other grazers. Aerial Survey numbers for elephants on Sango since 2009 are as follows:

No. Elephants	Year
654	2009
462	2010
393	2012
648	2013
474	2014
497	2015
949	2016
684	2017
665	2018

The latter shows a current density of 1.1 elephant per square kilometer, whilst the recommended density is 0.2-0.3 per square kilometer for the dry Savanna areas we occupy.

The continued high density of elephant has and is having a very negative affect on Sango's habitats. For example the baobab trees of which we have an abundance are often hundreds if not thousands of years old. Approximately 90 per cent of all of our baobab trees are now suffering damaged by elephants. If this remains unaddressed Sango will have lost all its baobab trees in a matter of a few years.

Sango practices "sustainable utilization" and is proactive in the use of its excess animals, which income funds our further conservation efforts. To this end, Sango moved 100 live elephants to reduce their numbers and to help restock the Zimbabwe National Parks area in 2018. Such translocation solutions do not exist regularly as most national parks and private conservancies within a survivable translocation distance from Sango are overstocked with elephants as well.

The annual elephant hunting quota amounts to three older bulls for Sango and seven in total for the SVC. All funds generated from hunting flow fully towards running, protecting and maintaining the property and specifically its wildlife assets and the underlying habitats. This includes employment for 135 local people (44 of whom are anti-poaching scouts) provision of water for wildlife, fire breaks, road and infrastructure maintenance and a full time ecologist.

Sango forms the largest single property within the SVC. The most recent SVC elephant numbers are from a 2017 Aerial survey, (2,390 km2 of operating properties) and showed that SVC was home to 2038 elephants. This is an average of 0.85 elephant per km2 when the recommended density is 0,2-0,3 Km2. As per above formula this implies that we have approximately 1,500 elephants too many. However, we believe that the total elephant population in the SVC amounts presently to some 2,500 animals.

Elephant safaris bring in between $60 - 70,000 for each elephant. WWF recommends a trophy hunting quota of 0.75 per cent of an elephant population whilst we are not even hunting half of that quota. So the SVC and its members are prejudiced of a potential $420-720 thousand that can be used for conservation. This negatively affects, employment of local people, water pumping, fire break maintenance, etc. Our highly successful rhino anti-poaching efforts cost about $500-600,000 per year. Under the most adverse conditions we have grown our rhino population from some 42 animals in the mid 1990's to about 190 today.

If the hunting income is thus disallowed from sustainably using our elephant population, we would no longer be able to fund the protection of our highly endangered rhinos. Is there anything more proactive in conservation than using the income from one species present in excessive numbers to protect another which is highly endangered? By denying the importation of trophies into the USA major income is no longer available for the protection of endangered and highly endangered species. Our poachers would welcome this action by the US Government; we highly successful conservationist do not.

Brisendine, Amy <amy_brisendine@fws.gov>

ESA permit application 93406C (African elephant sport-hunted trophy from Zimbabwe, 2018, Dande North)

1 message

Brisendine, Amy <amy_brisendine@fws.gov> Tue, Oct 1, 2019 at 9:24 AM
To: (b) (6), "Emma C. Sampson" <permits@conservationforce.org>
Cc: Amy Brisendine <amy_brisendine@fws.gov>

Ref 93406C

Dear Emma and Mr. Evans,

I am reviewing your application received in our office on June 1, 2018, to import a sport-hunted African elephant trophy from Zimbabwe. I apologize for the delay.

Can you please provide answers to the following questions?

1. Did you successfully hunt an elephant? If so, provide the date of the hunt.

2. Do you have any additional information to provide such as the CITES export permit from Zimbabwe?

3. If you did not hunt an animal, would you be willing to withdraw your application?

In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 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.

Thank you and please contact me if you have any questions.

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D
Falls Church, Virginia 22041
703-358-2005 direct
https://www.fws.gov/international/permits/
https://www.cites.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
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October 16, 2019

TRANSMISSION VIA EMAIL: amy_brisendine@fws.gov
Department of the Interior
U.S. Fish and Wildlife Service
Ms. Amy Brisendine, Biologist
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

RE: SUPPLEMENT TO APPLICATION TO IMPORT A SPORT-HUNTED TROPHY

PRT #:	93406C
APPLICANT NAME:	MILTON KARL EVANS
SPECIE:	Loxodonta Africana [African Elephant]
COUNTRY:	Zimbabwe
CONSERVANCY:	Dande North Hunting Concession

Dear Ms. Brisendine:

In response to your email dated October 1, 2019, regarding the above captioned matter, please be advised that Mr. Evans did not take an Elephant because he did not yet have an import permit, but when he gets the over due import permit he hopes to then hunt. Mr. Evans wants to pursue the permit until it is issued.

If you have any questions, please do not hesitate to contact us.

Sincerely,

/s/ Emma C. Sampson
PERMITS DEPARTMENT

JJJ/ecs

cc: File
Applicant: Karl Evans, via email: (b) (6) [redacted]

3240 S I-10 Service Road W, Suite 200 • Metairie, Louisiana 70001 • USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Brisendine, Amy <amy_brisendine@fws.gov>

[EXTERNAL] RESPONSE - EVANS -ESA Permit applt 93406C (African elephant sport-hunted trophy Zimbabwe, 2018

1 message

Emma C. Sampson <permits@conservationforce.org> Wed, Oct 16, 2019 at 1:01 PM
To: "Brisendine, Amy" <amy_brisendine@fws.gov>, (b) (6)

Dear Ms. Brisendine,

Please see attached response regarding the above captioned matter.

Best regards,

Emma

> On October 1, 2019 at 8:24 AM "Brisendine, Amy" <amy_brisendine@fws.gov> wrote:
>
> Ref 93406C
>
> Dear Emma and Mr. Evans,
>
> I am reviewing your application received in our office on June 1, 2018, to import a sport-hunted African elephant trophy from Zimbabwe. I apologize for the delay.
>
> Can you please provide answers to the following questions?
>
> 1. Did you successfully hunt an elephant? If so, provide the date of the hunt.
>
> 2. Do you have any additional information to provide such as the CITES export permit from Zimbabwe?
>
> 3. If you did not hunt an animal, would you be willing to withdraw your application?
>
> *In accordance with 50 CFR 13.ll(e), if the requested information is not received by this office within 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.*
>
> Thank you and please contact me if you have any questions.
>
> Amy Brisendine
> U.S. Fish and Wildlife Service
> International Affairs, Division of Management Authority
> 5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D
> Falls Church, Virginia 22041
> 703-358-2005 direct
> https://www.fws.gov/international/permits/
> https://www.cites.org

Emma C. Sampson
CONSERVATION FORCE, *Permits Division*

3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

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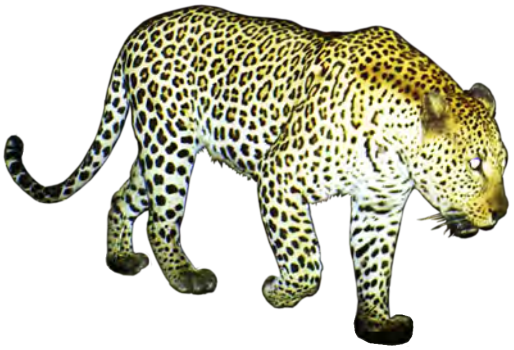

Opping Investments Pvt Ltd T/A
Charlton McCallum Safaris

14A Yellowwood Lane
Kambanji
Harare
+263 4 499 536

hunting@cmsafaris.com
www.cmsafaris.com

20 September 2019

Mrs. Rosemarie Gnam, Ph.D.

Chief: Division of Scientific Authority
Department of the Interior
5275 Leesburg
Pike
MS: IA Falls Church
VA 22041 - 3803

phone: 703 358 2497
rosemarie_gnam@fws.gov

Lion Non-Detriment Finding: Charlton McCallum Safaris

Dear Rosemarie,

Please find attached some supplementary information to help you make a N.D.F. for the hunting of lions in our concessions in the Mbire District, Zambezi Valley, Zimbabwe. We have kept meticulous records for our 10 years of operations in the district, however I have only included 2015 – 2019 as these are the years that Zimbabwe moved over to the "age-based" quota setting.

All of this data is verifiable from the official hunt return forms.

We do have a very good success rate on lion hunts, and every year we are seeing more and more old lions, which is really gratifying.

Kind regards,

Myles E. McCallum

(Director)

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Background

For way of background, we own three concessions, two of which (Dande Safari Area and Dande North) are contiguous:

Dande Safari Area (*Parks and Wildlife Estate – leased to Council/CMS*)	55,400 ha
Dande North (*communal land, Mbire district*)	72,500 ha
Dande East (*communal land – Mbire district*)	52,600 ha
Total area (hectares)	**180,500 ha**

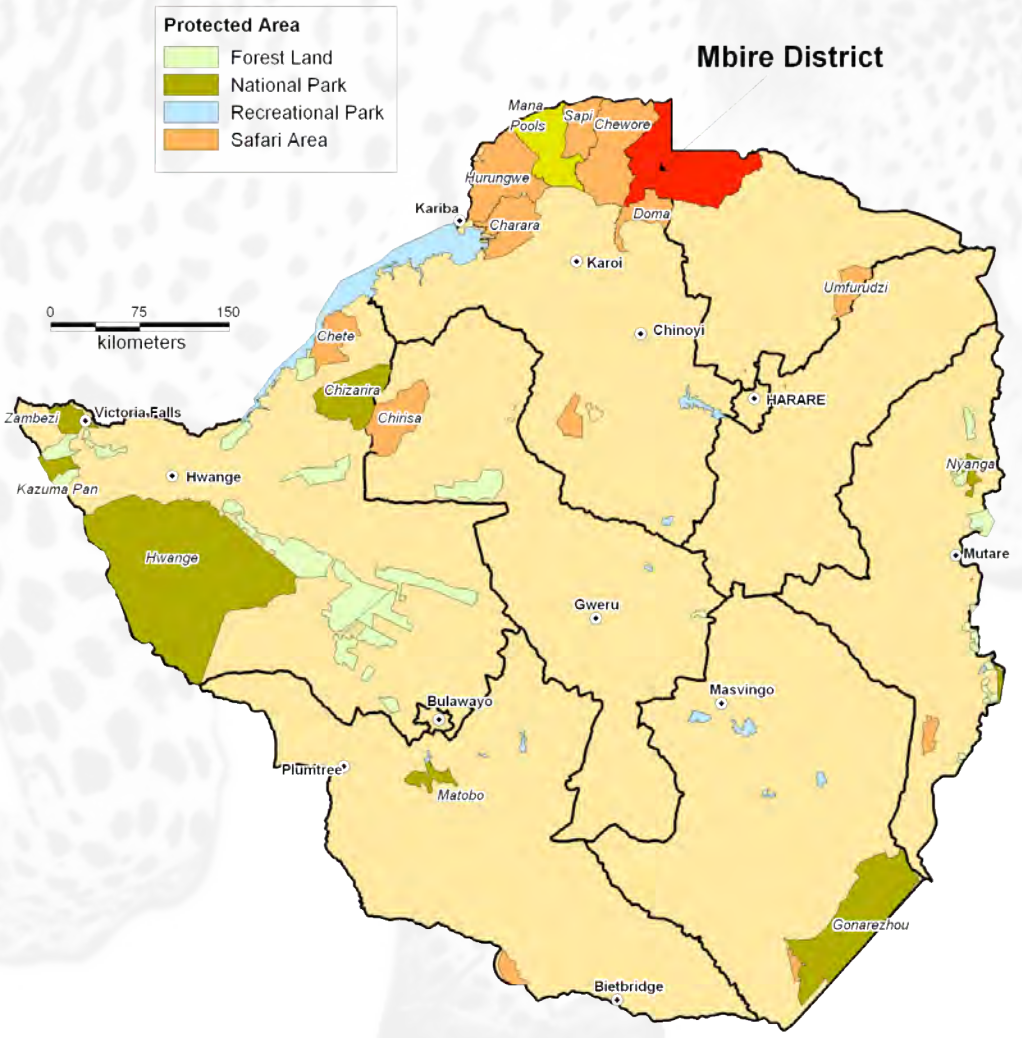


Figure 1: Map of wildlife area land use in Zimbabwe.

1 – Lion Hunt Summaries per annum

DSA – Dande Safari Area
MNA I – Mbire North Area 1
MNA II – Mbire North Area 2
MEA III – Mbire East Area 3

2015

Area	Dates	Hunt success	Date shot	Day of hunt	Hunt effort (%)	Bait nights	Skull length (in)	Skull width (in)	Trophy size (in)	Age estimation	Quota	Percent sold
DSA	10|10-30|10	Yes	13|10	4	19%	12	15.25	9.75	25	>5		
MNA I												
MNA II												
MEA III												
		100%			**19%**	**12**				**5**	**4**	**25%**

2016

Area	Dates	Hunt success	Date shot	Day of hunt	Hunt effort (%)	Bait nights	Skull length (in)	Skull width (in)	Trophy size (in)	Age estimation	Quota	Percent sold
DSA	26|04-14|05	Yes	11|05	16	84%	64	15.25	9.75	25	>5		
MNA I	07|06-04|07	Yes	03|07	27	96%	108	15.2	9.5	24.7	>4		
MNA II	26|04-14|05	No			100%	76						
MEA III	31|10-13|11	No			100%	0						
		50%			**95%**	**62**				**4.5**	**4**	**100%**

DSA – Dande Safari Area
MNA I – Mbire North Area 1
MNA II – Mbire North Area 2
MEA III – Mbire East Area 3

2017

Area	Dates	Hunt success	Date shot	Day of hunt	Hunt effort (%)	Bait nights	Skull length (in)	Skull width (in)	Trophy size (in)	Age estimation	Quota	Percent sold
DSA	19|08-05|09	Yes	22|08	4	29%	16	15.5	9.5	25	>6		
MNA I	14|09-25|09	Yes	25|09	7	50%	28	15.25	9.75	25	>6		
MNA II												
MEA III												
		100%			**40%**	**22**				**>6**	**4**	**50%**

2018

Area	Dates	Hunt success	Date shot	Day of hunt	Hunt effort (%)	Bait nights	Skull length (in)	Skull width (in)	Trophy size (in)	Age estimation	Quota	Percent sold
DSA	13|09-30|09	Yes	22|09	10	56%	40	14.5	9.5	24	>6		
MNA I	27|07-19|08	Yes	03|08	9	38%	36	14.5	9.5	24	>5		
MNA II												
MEA III												
		100%			**47%**	**38**				**>5.5**	**5**	**40%**

DSA – Dande Safari Area
MNA I – Mbire North Area 1
MNA II – Mbire North Area 2
MEA III – Mbire East Area 3

2019

Area	Dates	Hunt success	Date shot	Day of hunt	Hunt effort (%)	Bait nights	Skull length (in)	Skull width (in)	Trophy size (in)	Age estimation	Quota	Percent sold
DSA	04|05-24|05	Yes	17|05	14	67%	56	15.12	11	26.12	>6*		
MNA I	27|05-13|06	Yes	04|06	9	50%	36	14.69	9.12	23.81	>5*		
MNA II												
MEA III												
		100%			**58%**	**46**				>5*	**4**	**50%**

** these two lions have not been officially aged yet*

Overall Summary

Year	Total quota	Percent quota sold	Lions harvested	Hunt success	Day of hunt	Hunt effort	Bait nights	Skull length (in)	Skull width (in)	Trophy size (in)	Age estimation	Lion per hectare
2015	4	25%	1	100%	4.0	19%	12	15.25	9.75	25.00	>5	180500
2016	4	100%	2	50%	21.5	95%	62	15.23	9.63	24.85	>4.5	90250
2017	4	50%	2	100%	5.5	40%	22	15.38	9.63	25.00	>6.0	90250
2018	5	40%	2	100%	9.5	47%	38	14.50	9.50	24.00	>5.5	90250
2019	4	50%	2	100%	11.5	58%	46	14.91	10.06	24.97	>5.5	90250
	21	**53%**	**9**	**90%**	**10**	**52%**	**36**	**15**	**9.71**	**24.76**	**>5.5**	**108300**

Notes

Percent success	This was simply calculated by number of lions taken on hunts as a percentage of hunts sold
Day of hunt	This shows the average number of days on successful hunts required to take a lion
Hunt effort	Calculated by dividing the day lion taken over the number of days of the safari as a percentage. More days = more effort
Number of baits	Average number of baits nights required per hunt. This is an estimate in some cases
Skull length (in)	Average skull length over 5 years
Skull width (in)	Average skull width over 5 years
Trophy size (in)	Average skull size over 5 years
Percent sold	The percentage of lions on quota that were sold
Estimated age	The official ages allocated to our cats by Panthera. Only one penalty for a lion under 5 yrs. Three of 9 cats were estimated at >7 so the average age is only based on 'age categories' with >6 being oldest. If we managed all >6 this would be a perfect score

Variables

Obviously hunting requires some 'luck' and there are many variables such as:

- Hunt length (some hunts are only 7 days so obviously chances are much lower)
- Client physical ability
- Seasons
- Moon phases

Accuracy

Bait nights is a little inaccurate as not all PH's captured data correctly. Skull measurements – we should allow for error in this as some of these measurements can be a little rough 'in the field'. Also there is a variance between a dry skull and a wet skull

Otherwise all data has been pulled off of stamped and signed hunt return forms so should be considered accurate and verifiable.

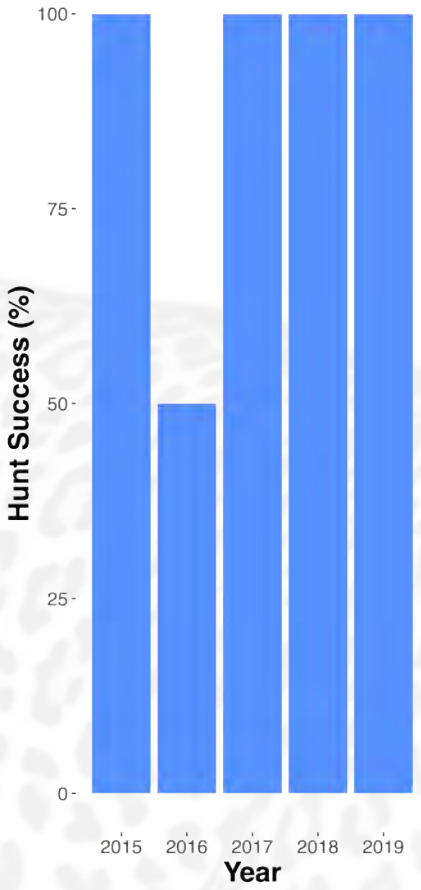


Figure 2: Average lion hunt success rate per annum

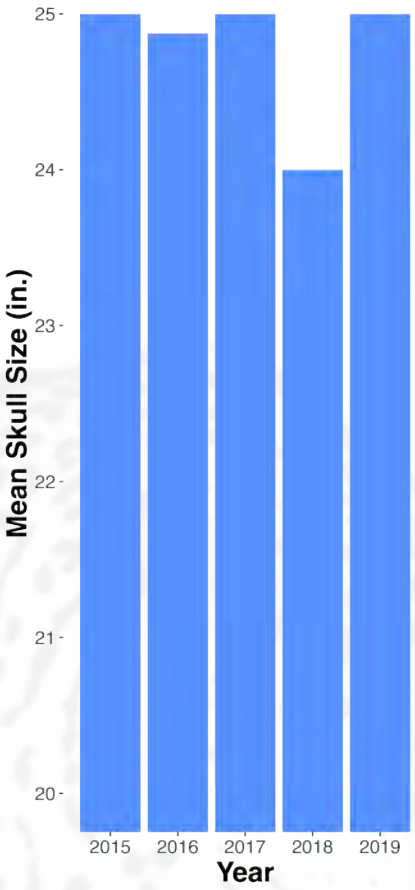


Figure 3: Average hunted lion skull size per annum

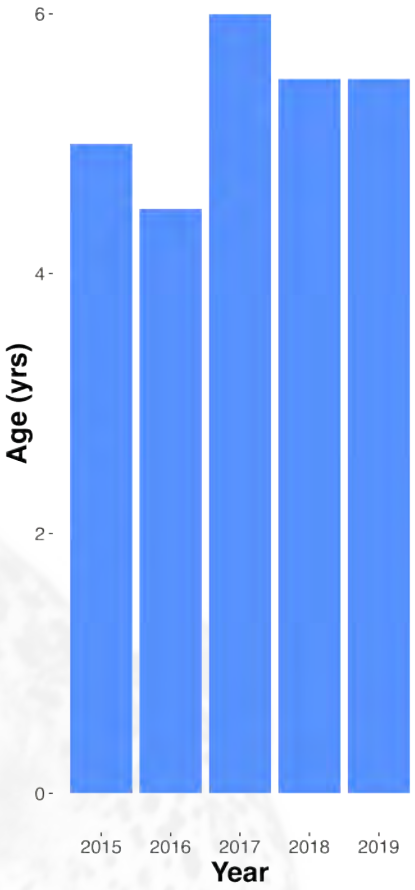


Figure 4: Average estimated age of hunted lions per annum – this is considered the key indicator of sustainable harvest

2 – Community Benefits: direct payments

2013 – 2018 total payments to National Parks

2013	2014	2015	2016	2017	2018	Total (US$)
182,861	164,869	146,158	119,270	140,135	140,450	893,743

2013

	Hunting	Social Funds	Camp Rental	Bird Quota	Total
Council	144,999	7,000	0	2,500	154,499
Ward 1	41,237	5,500	0	0	46,737
Ward 2	59,947	5,500	0	0	65,447
Ward 4	27,365	4,000	3,000	0	34,365
Ward 10	2,000	1,000	0	0	3,000
Ward 11	21,057	2,000	0	0	23,057
Ward 12	6,000	2,500	0	0	8,500
Total (US$)	**302,605**	**27,500**	**3,000**	**2,500**	**335,605**

2014

	Hunting	Social Funds	Camp Rental	Bird Quota	Total
Council	168,475	7,000	0	2,500	177,975
Ward 1	49,217	5,500	0	0	54,717
Ward 2	72,227	5,500	0	0	77,727
Ward 4	33,358	4,000	3,000	0	40,358
Ward 9	1,038	0	0	0	1,038
Ward 10	525	1,000	0	0	1,525
Ward 11	26,598	2,000	0	0	28,598
Ward 12	0	2,500	0	0	2,500
Total (US$)	**351,438**	**27,500**	**3,000**	**2,500**	**384,438**

2015

	Hunting	Social Funds	Camp Rental	Bird Quota	Total
Council	139,432	7,000	0	2,500	148,932
Ward 1	35,582	5,500	0	0	41,082
Ward 2	56,419	5,500	0	0	61,919
Ward 4	22,261	4,000	3,000	0	29,261
Ward 9	0	0	0	0	0
Ward 10	3,862	1,000	0	0	4,862
Ward 11	15,950	2,000	0	0	17,950
Ward 12	0	2,500	0	0	2,500
Total (US$)	**273,506**	**27,500**	**3,000**	**2,500**	**306,506**

2016

	Hunting	Social Funds	Camp Rental	Bird Quota	Total
Council	79,010	7,000	0	2,500	88,510
Ward 1	44,894	5,500	0	0	50,394
Ward 2	22,195	5,500	0	0	27,695
Ward 4	11,300	4,000	3,000	0	18,300
Ward 9	611	0	0	0	611
Ward 10	0	1,000	0	0	1,000
Ward 11	6,879	2,000	0	0	8,879
Ward 12	0	2,500	0	0	2,500
Total (US$)	**164,889**	**27,500**	**3,000**	**2,500**	**197,889**

2017

	Hunting	Social Funds	Camp Rental	Bird Quota	Total
Council	118,973	7,000	0	2,500	128,473
Ward 1	52,737	5,500	0	0	58,237
Ward 2	37,486	5,500	0	0	42,986
Ward 4	25,787	4,000	3,000	0	32,787
Ward 9	0	0	0	0	0
Ward 10	2,265	1,000	0	0	3,265
Ward 11	8,682	2,000	0	0	10,682
Ward 12	2,359	2,500	0	0	4,859
Total (US$)	**248,289**	**27,500**	**3,000**	**2,500**	**281,289**

2018

	Hunting	Social Funds	Camp Rental	Bird Quota	Total
Council	108,773	7,000	0	2,500	118,273
Ward 1	31,342	5,500	0	0	36,842
Ward 2	45,753	5,500	0	0	51,253
Ward 4	21,374	4,000	3,000	0	28,374
Ward 9	900	0	0	0	900
Ward 10	3,365	1,000	0	0	4,365
Ward 11	4,861	2,000	0	0	6,861
Ward 12	1,329	2,500	0	0	3,829
Total (US$)	**217,697**	**27,500**	**3,000**	**2,500**	**250,697**

2013 to 2018 total payments to Wards and Mbire RDC.

	Hunting	Social Funds	Camp Rental	Bird Quota	Total
Council	1,026,624	35,000	0	12,500	1,074,124
Ward 1	260,509	27,500	0	0	288,009
Ward 2	299,527	27,500	0	0	327,027
Ward 4	148,445	20,000	15,000	0	183,445
Ward 9	2,549	0	0	0	2,549
Ward 10	13,017	5,000	0	0	18,017
Ward 11	96,027	10,000	0	0	106,027
Ward 12	24,688	12,500	0	0	37,188
Total (US$)	**1,871,386**	**137,500**	**15,000**	**12,500**	**2,036,386**

3 – Anti Poaching: DAPU financial contribution

Year	Scouts/Managers	Rations	Mileage/Kits	Rewards	Total
2014	31,275	7,980	23,111	9,602	63,988
2015	32,500	9,240	23,491	9,244	74,475
2016	35,165	9,240	45,062	5,449	59,751
2017	35,165	10,360	63,388	4,669	113,582
2018	30,660	7,980	60,369	3,265	102,274
Total (US$)	**129,600**	**36,820**	**215,421**	**32,229**	**414,070**

Summary of anti-poaching successes

Year	Snares Removed	Dogs Shot	Meat Poachers	Elephant Poachers	Tradition Weapons
2014	2375	9	19	4	22
2015	2655	20	11	5	11
2016	1479	1	12	2	10
2017	625	1	8	5	50
2018	263	5	9	1	6
Total	**7397**	**36**	**59**	**17**	**99**

Summary of Investments into Mbire District 9 years

Investment	2010	2011	2012	2013	2014	2015	2016	2017	2018	Total (US$)
Water (actual)	0	18,500	0	30,272	0	0	32,550	24,321	25,000	130,643
Anti-poaching (actual)	30,000	30,000	30,000	75,000	71,968	74,475	94,916	113,582	103,474	623,415
Demarcations and restock (actual)	14,000	0	12,000	27,000	0	0	2,500	0	0	55,500
Fire (estimated)	6,500	6,500	6,500	10,000	10,000	10,000	10,000	10,000	10,000	79,500
Roads (estimated)	20,000	20,000	20,000	30,000	30,000	30,000	30,000	30,000	30,000	240,000
PAC (estimated)	5,000	5,000	5,000	7,500	7,500	7,500	7,500	7,500	7,500	60,000
Trophy fees (N and E)	54,420	95,450	101,125	335,605	384,438	306,506	197,889	281,289	217,697	1,974,419
Social funds and camp rental N and E (actual)	15,500	15,500	15,500	30,500	30,500	30,500	30,500	30,500	33,000	232,000
Bird Quota N and E (actual)	1,500	1,500	1,500	3,500	3,500	3,500	3,500	3,500	3,500	25,500
Donations (estimated)	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	45,000
Mudzimu's (actual)	600	600	600	1,200	1,200	1,200	1,200	1,200	1,200	9,000
D.S.A Social Fund and bird quota to Mbire	42,50	42,500	42,500	42,500	42,500	42,500	42,500	36,500	36,500	370,500
DSA Profit to Mbire (actual)	89,310	70,193	32,270	19,125	2,651	1,250	-4,185	-10,463	-6,416	193,735
National Parks	117,925	138,660	117,945	182,861	164,869	146,158	119,270	140,13	140,450	1,268,273
Total (US$)	**404,265**	**451,414**	**391,952**	**802,076**	**756,140**	**660,604**	**575,156**	**675,081**	**608,923**	**5,307,485**

ORIGINAL

TOURISM ACT [CHAPTER 14:20]

MA. 003072

Certificate of Registration As a Designated Tourist Facility

I certify that, in terms of Section 39 of the Tourism Act [Chapter 14:20]

CHARLTON MCCALLUM SAFARIS

(trading name of designated tourist facility)

14 YELLOW WOOD LANE, KAMBANJI, HARARE.

(situated at)

is registered as **HUNTING OPERATOR (HOP 0259)**

(product category)

carrying our hunting / non-hunting tours in the following areas

MBIRE DISTRICT

The validity of this registration shall expire on the **FIRST**

day of **JUNE** **2020**

Grade (where applicable):.....

Harare **31ST** **MAY** **2019**

Chief Executive of the
Zimbabwe Tourism Authority

Zimbabwe
A World of Wonders

*Delete the inapplicable

Form D.T.F. 3

Zimbabwe Revenue Authority

Tax Clearance Certificate (ITF263)

Tax Year Ending 31 December 2019

Opping Investments (Pvt) Ltd Charlton McCallum Safaris

Business Partner Number: 0200061095

Your Tax position is Satisfactory. No 10% tax should be withheld

Clearance issued on 02/18/2019 at 09:18:43 valid until 12/31/2019

Authentication code: UZTU.LSSC.4BBM.CAT7

The authentication and validity of this certificate must be validated on ZIMRA page at: http://efiling.zimra.co.zw

Summary

I have included some financial statistics for you to look at. I think that they clearly demonstrate the financial contribution of hunting in our concessions to the local communities and to National Parks. This contribution is what keeps the biodiversity in Mbire safe – the animals have worth. I have not included every detail but have provided a general overview.

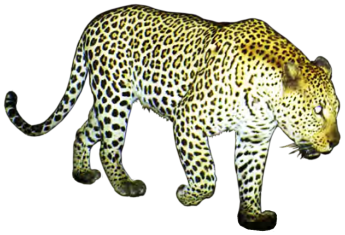
Hopefully the statistics show that we have been responsible stewards. We have avoided selling safaris unless we feel that our hunters have a high chance of success at a legal lion. As a company it is worth noting that many of these investments that we have made are not mandatory – we have made them for many years on a voluntary basis. One of these is our anti-poaching unit, which is wholly funded by our hunters and ourselves. Every single hunter who hunts with us makes a contribution to anti-poaching as per his or her contract.

It should be noted that since lion hunting and quota setting moved over to an age based system administered by Panthera, a lot of the data that we have collected over the years has become less relevant.

The fact that we have a high success rate with legal lions of the appropriate age-class (past-prime), in conjunction with our on-going offtake monitoring, should indicate the current and future sustainability of the harvest; and facilitate real and and boots-on-the-ground conservation of the wildlife biodiversity in our concession.

Kind regards,

Myles E. McCallum



Charlton McCallum Safaris
in association with Global Marketing Consultants LLC

Directors: **C. Ndondo, J.D. Charlton, M.E. McCallum**

Brisendine, Amy <amy_brisendine@fws.gov>

[EXTERNAL] Re: Supplement to 93406C EVANS, Milton (Elephant)

1 message

Lei Ann Konishi <lkonishi@conservationforce.org> Mon, Dec 2, 2019 at 4:51 PM
To: amy_brisendine@fws.gov
Cc: Lei Ann Konishi <lkonishi@conservationforce.org>

Amy,

The following document and videos are supplements to above listed elephant permit application for Charlton McCallum safari area. The document is: “Lion Non-Detriment Finding: Charlton McCallum Safaris” dated September 29, 2019 by Myles McCallum and also 2 DSC Foundation Videos titled “The Guardians” and “The Unheard Voice.” https://www.nrahlf.org/articles/2019/10/14/dsc-foundation-videos-explain-why-hunting-is-conservation/

Lei Ann Konishi

Permit Assistant

Conservation Force

P.O. Box 278

Metairie, Louisiana 70004-0278

Office: (504) 837-1233

Fax: (504) 837-1145

www.conservationforce.org

2 attachments

2019.09.19 CMcCallum Safaris LION.NDF - Zimbabwe 20190919.pdf
5276K

dsc-foundation-videos-explain-why-hunting-is-conservation.htm
107K

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: Elder	1.b. First name: Chris	1.c. Middle name or initial: L	1.d. Suffix:
2. Date of birth (mm/dd/yyyy): (b) (6)	3. 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: 72764	1.e. County/Province: Washington	1.f. Country: USA
2.a. Mailing Address (include if different than physical address, include name of contact person if applicable):				
2.b. City:	2.c. State:	2.d. Zip code/Postal code:	2.e. County/Province:	2.f. Country:

D. All applicants MUST complete

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

(b) (6) 5-29-18

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.

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

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

RCVD JUN 11 2018

Federal Fish and Wildlife Permit Application Form

RCVD JUN 11 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Williamson	Matthew	Wade	

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

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

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Minot	ND	58701	Ward	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 11US58296A/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the [illegible] false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
(b) (6)
05/09/2018
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: 0 (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: 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: Caprivi Strip, Namibia. Balyerwa Conservancy. Closest City: Katima Mulilo Namibia
   b. Date wildlife is to be hunted: 08/14/2018 - 08/29/2018
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks). Tusks, Ears, Tail, 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: Lwyk Jansen Van Vuuren
Business Name: Leopard Legend Hunting Safaris
Address: Farm Gross Omaruru
Address: Number 20
City: Outjo
State/Province: N/A
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 (b) (6) [redacted] Date: 05/09/2018

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.

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).

N/A

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. N/A

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

Matt Williamson (b) (6) [redacted]

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

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

To whom it may concern:

Re: Elephant CITES Import application for Namibia

Requestor: Matthew W Williamson

In support of the application for CITES, a request for additional information is requested by the US Fish and Wildlife Service. The hunting will take place at the Balyerwa Conservancy in the southwest corner of the Caprivi Strip, Namibia. A map is included for reference for the location of the conservancy. The closest hub city is Katima Mulilo, located approximately 100 Km to the northeast of the conservancy. Balyerwa is a communal based wildlife conservancy in Namibia and is utilized and managed for sustainable use and harvest of native wildlife species. Funds generated from the activity of the hunt, paid for by the visiting hunters will not only aid in conservation, but will also help employ local guides, game scouts, camp staff, game handlers, local taxidermists and help feed local villagers from the animals harvested during the hunt.

- Approximately 65% of the money paid for the hunt will go back to the conservancy. This money will be utilized and dispersed throughout the communities within the conservancy. This equates to approximately $38,000.00 US dollars staying within the local communities of the Balyerwa conservancy. Of that $38,000.00, approximately $8,000.00 US is apportioned directly to conservation, habitat enhancements (such as water installations) and anti-poaching units and game guards. The money generated from this hunt will no doubt further aid in development and protection of elephants within the conservancy.

- A minimum of 25 people will be employed during the process of the hunt, from arrival to beyond the departure of the hunting party (Hunter, PH, Scouts, etc.)

- Additional members travelling with the applicant will also help benefit local tourism with funds spent within the nearby communities on curios and guided tours.

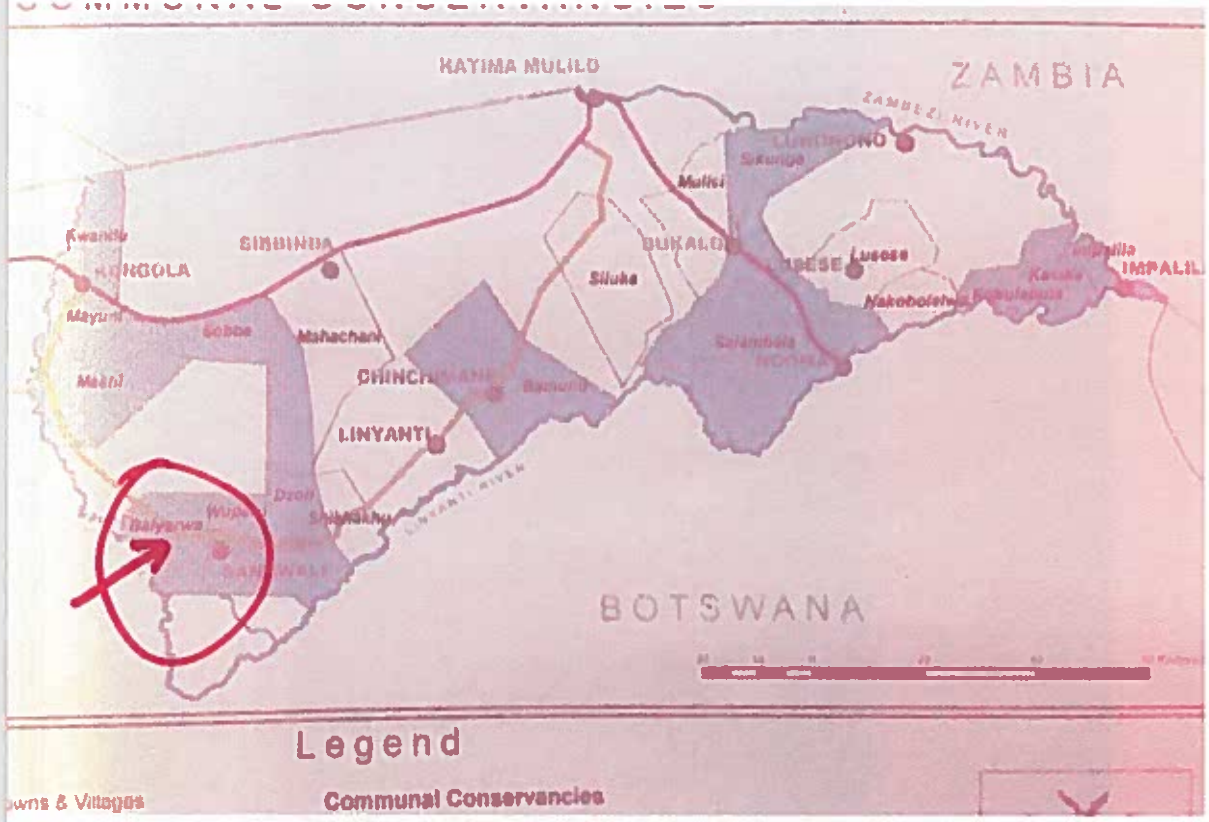
- Trophies that return to the US will be on display for informational and educational purposes at the applicants residence.

Please consider the economic and environmental benefits that can be realized by utilizing a sound management plan and legal sport hunting of elephant within this conservancy.

Respectfully submitted,

(b) (6) [redacted]

Matthew W. Williamson


KATIMA MULILO
ZAMBIA
ZAMBEZI RIVER
Sikunga
Mulikuzi
SIBBINDA
BUKALO
Lusese
Kasika
IMPALILA
Siluka
Mayuni
Sobbe
Mahachana
Mashi
CHINCHIMANE
Bamumbi
LINYANTI
Dzoti
Shibalinyana
LINYANTI RIVER
BOTSWANA
Legend
Communal Conservancies

Barry, Anna <anna_barry@fws.gov>

Matthew Williamson PRT #95067C

1 message

Barry, Anna <anna_barry@fws.gov> Wed, Jul 18, 2018 at 4:43 PM
To: (b) (6)

Dear Mr. Matthew Williamson,

The following is in response to your request regarding the status of your application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African elephant and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. **We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Wed, Oct 2, 2019 at 10:42 AM
To: (b) (6)

U.S. Fish and Wildlife Service Prt # 95067C

On **06/11/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 95067C**. At the me of the applic aon' s submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] Re: Elephant Withdrawal Inquiry

1 message

Matt Williamson (b) (6) Thu, Oct 3, 2019 at 12:10 AM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>

Hi Tim,

Thank you for reaching out. Yes, I would like to keep this application open. I did successfully harvest an elephant on this specific trip to the Caprivi. I will contact the outfitter to get the coordinates and all other necessary bits of information and forward those on two you. Please allow me a couple days to track down this information. Thank you again!

Matt Williamson

From: MacDonald, Tim
Sent: Wednesday, October 2, 2019 9:42 AM
To: (b) (6)
Subject: Elephant Withdrawal Inquiry

U.S. Fish and Wildlife Service Prt # 95067C

On **06/11/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 95067C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

Form 3-200-20

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

RCVD JUN 14 2018 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
RAGAZZINE	JUSTIN	M	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
YOUNGSTOWN	OHIO	44511	MAHONING	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the [redacted] I certify that the information submitted in this application for a permit is complete and [redacted] false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

06/07/2018

Signature of applicant/Principal Officer for [redacted] photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

JUSTIN RAGAZZINE
(b) (6) [redacted]
Youngstown, Ohio 44511

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

JUSTIN RAGAZZINE
(b) (6) [redacted]

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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:

ZIMBABWAE, CHIBWEDZIVA

   b. Date wildlife is to be hunted:

FEBRARY 1-12 2019

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

CLIFTON WALKER, COLLECT 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).

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?

   14,000 ELEPHANTS IN AREA, 3 TIMES THE CARRYING CAPACITY OF THE AREA. 30,000 IN GONEREZHOU PARK WHICH IS NEIGHBORING

   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 PERMITS ARE ISSUED BY THE COMMUNITY WITH THE TRIBESMAN BENIFITING DIRECTLY FROM THE WILDLIFE, POACHING HAS BECOME ALMOST NON EXISTENT, AND NOT ONE ELEPHANT HAS BEEN POACHED IN THE LAST 18 YEARS IN THIS AREA. DUE TO THE KNOWN VALUE IT POSSESSES

   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 FUNDS ARE AND HAVE BEEN USED TO BUILD A SCHOOL, CLINIC, SEVERAL GRINDING MILLS HAVE BEEN BOUGHT AND SET UP, BOREHOLES DRILLED AND EQUIPED. ALL WITH MONEY FROM THE HUNTS CONDUCTED.

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: (b) (6) _____ Date: 6/7/2018

Be aware that there may be a[illegible]nents 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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July 19, 2019

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

RE: WITHDRAW PRT No. MA95146C

RCVD JUL 24 2019

Dear Chief Cogliano:

Please be advised that Justin Ragazzine applied for an elephant import permit (PRT No. MA95146C) before his planned hunt. We would like to withdraw his application as he did not harvest an elephant.

Please also find enclosed a Notice of Representation for Justine Ragazzine, as the client mailed the application himself and he was unsure if he included a copy of the notice of representation.

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

Sincerely,

John J. Jackson III

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted 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.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

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

Signe (b) (6)

Name: Justin Ragazzine

Date: 12/07/18

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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Shane Mahoney
Renee Snider

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

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

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

NOTICE OF REPRESENTATION

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

Name: _Ross H Studer_____

Date: _May 8, 2018_____ May 9th, 2018

Form 3-200-20

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

RCVD JUN 14 2018 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Stuber	Ross	Hardy	

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

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
San Antonio	TX	78212	Bexar	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in *Title 50 Part 13 of the Code of Federal Regulations* and the other *applicable parts in subchapter B of Chapter I of Title 50*, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

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 heards 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 gaurds 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: (b) (6) [redacted] 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).

MacDonald, Tim <tim_macdonald@fws.gov>

Trophy Hunt # 95150C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Mon, Sep 30, 2019 at 2:30 PM
To: (b) (6)

U.S. Fish and Wildlife Service Prt # 95150C

On **06/14/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 95150C**. At the me of the applic aon' s submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] CONFIRMATION - Trophy Hunt # 95150C

1 message

Emma C. Sampson <permits@conservationforce.org> Fri, Oct 4, 2019 at 9:59 AM
To: Ross Studer (b) (6), tim_macdonald@fws.gov

Dear Mr. MacDonald,

This is to confirm Mr. Ross Studer harvested Elephant,

DATE OF HARVEST: July 19, 2018
CONSERVANCY: Bwabwata West National Park
COUNTRY: Namibia

Thank you,

Emma

On October 2, 2019 at 11:30 AM Ross Studer <(b) (6)> wrote:

Begin forwarded message:

From: "MacDonald, Tim" < tim_macdonald@fws.gov>
Date: September 30, 2019 at 1:30:47 PM CDT
To: <(b) (6)
Subject: Trophy Hunt # 95150C

U.S. Fish and Wildlife Service Prt # 95150C

On **06/14/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 95150C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

Emma C. Sampson
CONSERVATION FORCE, *Permits Division*
3240 S I-10 Service Road W
Suite 200
Metairie, LA 70001-6911
p. 504-837-1233
e. permits@conservationforce.org
www.conservationforce.org

[EXTERNAL] Re: Supplement for Permit #95150C and #95151C Ross and Stanley Studer

Aimee Korver <permits@conservationforce.org>

Wed 7/1/2020 2:50 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>; (b) (6) (b) (6) >; (b) (6)

2 attachments (1 MB)

SupplementtoStanStuder#95151C.pdf; SupplementRossStuder#95150C (2).pdf;

Ms. Brisendine,

I am submitting the supplement information for after the hunt for both Ross and Stanley Studer. I had put the wrong year of the hunt on the first letter. The year of the hunt for both applicants was 2018. Would you please submit these letters in replacement of the previous ones?

Let me know that you have received this and if you have any questions. All of the hunting permits were included in the last e-mail- but I can forward anything you may need again.

Kindest Regards,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

> On June 30, 2020 at 11:54 AM Aimee Korver <permits@conservationforce.org> wrote:
>
> Ms. Brisendine,
>
> Please see the attached supplements to the import permit applications #95150C and #95151C for Ross and Stanley Studer.
>
> Please let me know that you have received these documents and if you have any questions.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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:
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SHANE MAHONEY
RENEE SNIDER

June 30, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-MAIL: amy_brisendine@fws.gov

RE: PRT # 95150C, applicant Ross Studer for an elephant trophy import from Namibia
Supplement to Existing Application

Ms. Brisendine:

This is a supplement to the existing application, PRT #95150C, for Ross Studer for his elephant trophy from Namibia

Answers to Question 6 of the import permit application:

6a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Bwabwata West National Park, hunting concession – GPS Coordinates
S 18 09C 162
E 021 42C 495

6b. Date wildlife was hunted:

July 18, 2019

6c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Huntafrica Namibia. P.H.- J.H. Pienaar Sr.

6d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document

Buffalo Camp, Divundu, Okavango 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).

Please see the attached permits

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].Name:Business Name:Address:City:State/Province:Country, Postal Code

Shipper –
Trophaendienste – Louw Nel
P O Box 21068
Windhoek
Namibia

Professional Hunter –
J.H. Pienaar, Sr.
Namibia

In addition, we would like to include an operator enhancement report for Huntafrica Namibia that has been updated this year.

Please refer to the numerous documents and responses previously submitted to FWS by Conservation Force, Professional Hunters, Operators and Professional Hunting Organizations, as well as information submitted by the government authorities of Namibia, which demonstrate that Elephant hunting programs are well managed, and the hunting enhances the survival of the species in making an enhancement determination for this import.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. Ross Studer w/attachments

Enclosures:
a. Operator Enhancement Report-Hunt Africa Namibia with map
b. Hunting Permits- Ross Studer

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		180765
VALID FROM:		01.07.2018
VALID TO:		22.07.2018
RECEIPT No.:	P	5759136

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: R. H. Studer

Residential Address:

Country: U.S.A

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

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common	2X	Springbok		*Other Please	
Buffalo	2X	Klipspringer		Steenbok		report back	
Crocodile		Kudu	1X	Warthog	1X	within 48	
Dik-Dik		Lechwe	1X	Waterbuck		hours after the	
Eland		Oryx (Gemsbok)		Wildebeest, Black		hunt.	
*Elephant	1X	Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck	2X	Zebra Burchell's			
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan		Leopard			
Impala Black-Faced		Sable	1X	Lion			

On the following farms / hunting concessions / safari / guestfarm: Bwabwata ~~East~~ West

Guided by (name of guides): J. H. Prinsloo (Snr)

MINISTRY OF ENVIRONMENT & TOURISM
Selma
ISSUING OFFICER (NAME & SIGNATURE)
UNDER THE AUTHORITY OF THE MINISTER, POHAMBA SHIFETA IN TERMS OF SECTION 78 OF THE NATURE CONSERVATION ORDINANCE, 1975 (ORDINANCE NO. 4 OF 1975) AS AMENDED

Official MET date stamp

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

prime press 042018

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
13/7/18	BUFFALO ✓	143		41	45				♂				[redacted]	
15/7/18	WARTHOG ✓	29	1	15					♂	1				
16/7/18	LECHWE ✓	61	60	18	18				♂	11				
18/7/18	KUDU ✓	143	140	28	28				♂					
19/7/18	ELEPHANT	145		43					♂					
			REPORT BACK TO RUELDA ON 20-7-2017											

*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.

OPERATOR ENHANCEMENT QUESTIONNAIRE

1. **OPERATOR INFORMATION**
   a. Name of Area Operator: HUNTAFRICA NAMIBIA
   b. Years in business: 32 years
   c. Name of Company conducting hunt: HUNTAFRICA NAMIBIA
   d. Closest town to hunt location: DIVUNDU / RUNDU
   e. Country where hunt will take place: NAMIBIA

2. **CONCESSION**
   a. Name of Concession: BWABWATA WEST NATIONAL PARK
   b. Area in Km^2: 3800
   c. Land tenure: GOVERNMENT LEASE
   Government Lease X Community ____ Private Ranch ____ Private Conservancy
   d. Length of Concession Agreement: 5 years
   e. Can it be renewed? Yes X No ____
   f. Length of Renewal, if applicable: 5 years
   g. Estimated total amount received in trophy fees last year, if applicable: N/A
   h. Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:
   Yes, annual reporting: detailed report to Ministry, of each client + every animal hunted.
   i. Please provide the Concession location and nearest City: S 18.09°C 162 E 021 42°C 495, Rundu
   j. Please attach a map or maps with the boundaries marked and showing the nearest City Attached
   k. If the Concession borders a National Park, please provide Park name: Inside Bwabwata National Park
   l. Description of general and distinctive habitat features and any water features:
   Bushveld
   The Okavango river forms the western border

3. **COMMUNITIES IN THE CONCESSION**
   a. Are there any communities living in the Concession? Yes X No ____
   b. If so, estimated number of people or villages in the Concession? 1 Village - Omega - 1000 people
   c. Are there communities bordering this Concession? Yes X No ____
   d. If so, estimated number of people or Villages around the Concession? Muchiko area - 500 people

4. **RELEVANT GAME POPULATIONS IN THE CONCESSION:**[1]

SPECIES NAME	RELATIVE ABUNDANCE			ESTIMATED POPULATION	3-YEAR TREND			HOW IS IT MONITORED?
	DENSE	AVG.	SPARSE		UP	DOWN	STABLE	
ELEPHANT	X			2500			X	By counts
LION			X		X			
LEOPARD	X						X	
PREY SPECIES								

[1] The 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?"

5. LOCAL COMMUNITY PARTICIPATION

a. Total employment number: 40

b. Please identify the number and type of all employees:

EMPLOYEE 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:		

6. 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:

EMPLOYEE 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		
COMMUNITY RELATIONS PERSONNEL	1		
OTHERS:			

7. ANTI-POACHING EFFORTS:[2]

a. Number of Anti-Poaching staff: NDf and Police (number unknown)

b. Are Anti-Poaching Patrols conducted during the hunting season, off-season, or both?
Hunting season: _____ Off-season: _____ Both seasons: X

c. Months during which Anti-Poaching Patrols are conducted: All year round

d. Number of Anti-Poaching Patrols per month: daily patrols

e. Description of Anti-Poaching equipment, vehicles, etc.:

[2] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

7. **ANTI-POACHING EFFORTS:** *[CONTINUATION]*

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution?
NDF and Police

g. Do you offer rewards to poaching informants leading to arrest? Yes X No ____

h. Do you offer rewards to poaching informants upon conviction? Yes ____ No X

i. Please describe the company's anti-poaching expenditures below:

TYPE OF EXPENSE	SPENDING 2017	SPENDING 2018	SPENDING 2019	REMARKS
SALARIES FOR ANTI-POACHING SCOUTS	N$31,200	N$31,200	N$34,320	
EQUIPMENT				
VEHICLES	4x4 vehicle	4x4 vehicle	4x4 vehicle	
PETROL	As needed	As needed	As needed	
REWARDS PAID	Each person arrested, the informer get N$5000-00			
OTHER:				
OTHER:				
TOTALS				

j. What currency are the expenditures given in? Namibia Dollar

8. **ANTI-POACHING RESULTS:**

CATEGORY	2017	2018	2019	REMARKS
POACHING INCIDENTS DISCOVERED				No Poaching in the last 3 years.
ELEPHANT CARCASSES OBSERVED				
LION CARCASSES OBSERVED				
LEOPARD CARCASSES OBSERVED				
IVORY POACHERS ARRESTED				
MEAT POACHERS ARRESTED				
OTHER POACHERS ARRESTED		N/A		
POACHERS CONVICTED				
SNARES/GIN TRAPS COLLECTED				
FIREARMS CONFISCATED				
VEHICLES CONFISCATED				
BICYCLES CONFISCATED				
BOATS/NETS CONFISCATED				
TUSKS RECOVERED				
OTHER:				

9. COMMUNITY INVESTMENT:[3]

a. Does the Company contribute money or goods/services to local communities?
X Yes _____ No

b. If so, what percentage or amount is shared, how often, and why (e.g.: required by law, required by contract, voluntary contribution)?
2.5 Million Nam Dollars, required by law, required by contract + voluntary contribution

c. Does the Company provide game meat to nearby communities? Yes X No _____

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:
45 tons of 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.
N/A

f. Please describe any consolation payments made to local residents damaged by game species
N/A

g. What currency are the expenditures reported in? Namibian Dollars

SPECIES	DAMAGE CAUSED	CONSOLATION PAID 2017	CONSOLATION PAID 2018	CONSOLATION PAID 2019
ELEPHANT				
LION		N/A - because it's a National Park.		
LEOPARD				
OTHER				

a. Please describe any community projects paid for by the Company:
[USE SEPARATE SHEET] Training centre - Renovations of offices, vehicles donated.

b. What currency are the expenditures reported in? Namibian Dollars

TYPE OF PROJECT	SPENDING 2017	SPENDING 2018	SPENDING 2019	REMARKS
EDUCATION (E.G.: CLASSROOMS, OFFICES)	N$ 110,000	N$ 120,000	N$ 130,000	
EDUCATION (E.G.: SCHOOL FEES, SCHOOL SUPPLIES)		Uniforms		
HEALTH (E.G.: CLINICS, OFFICES)				
HEALTH (E.G.: MEDICAL SALARIES, EQUIPMENT)				
COMMUNITY SCOUT SALARIES	N$ 20,000	N$ 30,000	N$ 40,000	
OTHER COMMUNITY ANTI-POACHING				

[3] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

9. COMMUNITY INVESTMENT: *[CONTINUATION]*

TYPE OF PROJECT	SPENDING 2017	SPENDING 2018	SPENDING 2019	REMARKS
LOCAL GOVERNMENT ACTIVITIES				
WATER INFRASTRUCTURE IMPROVEMENTS		Borehole drilled	Water Tank installed	N$ 120,000
SPORTS TEAMS FUNDED	N$90,000	N$90,000	N$90,000	
CONSTRUCTION MATERIALS DONATED	N$500,000	N$500,000	N$500,000	
OTHER: _____				
OTHER: _____				
TOTALS				

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	HUNTING ELEPHANT	HUNTING LION	HUNTING LEOPARD	HUNTING ALL SPECIES
NUMBER OF U.S. CLIENTS	2017: 6	2017: —	2017: 2	2017:
	2018: 6	2018: —	2018: 0	2018:
	2019: 5	2019: —	2019: 0	2019:
PERCENTAGE OF U.S. CLIENTS	2017: 100·1.	2017: —	2017: 100·1.	2017:
	2018: 100·1.	2018: —	2018: —	2018:
	2019: 90·1.	2019: —	2019: —	2019:
TROPHY FEES PAID BY U.S. CLIENTS	2017:	2017:	2017:	2017:
	2018:	2018:	2018:	2018:
	2019:	2019:	2019:	2019:

11. Approximate Dollar amount and/or percentage of Company's revenue from U.S. Clients: ~~$~~ 90·1.

12. OTHER INFORMATION: Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies (e.g.: aging, size, resting areas), Concession Improvements (e.g.: digging and maintaining boreholes, restocking), Management Activities, Research, etc.
[USE SEPARATE SHEET]

13. I declare that the foregoing is true and correct:

Bwabwata West National Park.
CONCESSION NAME

TELEPHONE: 00264 61 305767

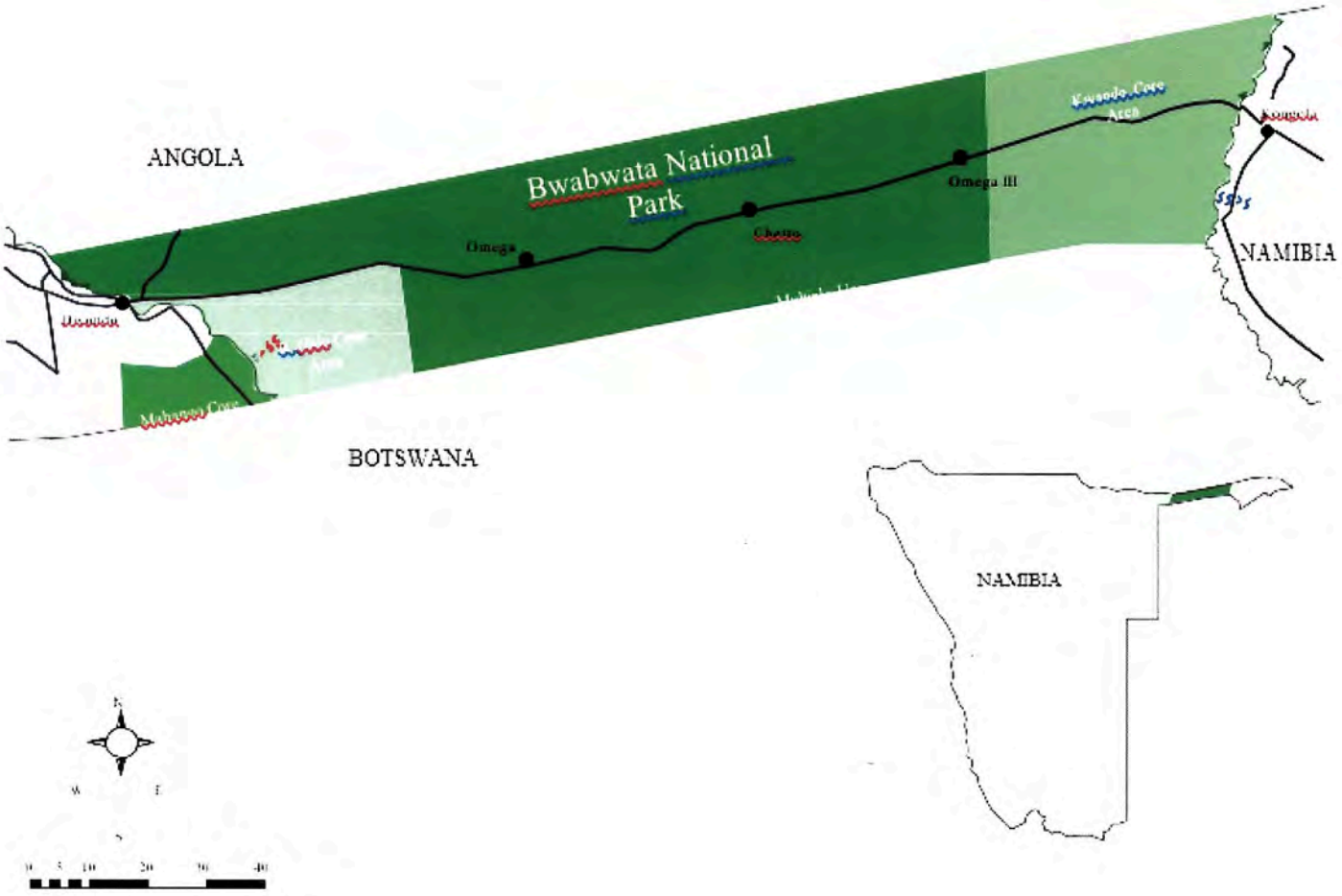
EMAIL: accounts@tippingpoint.com.na

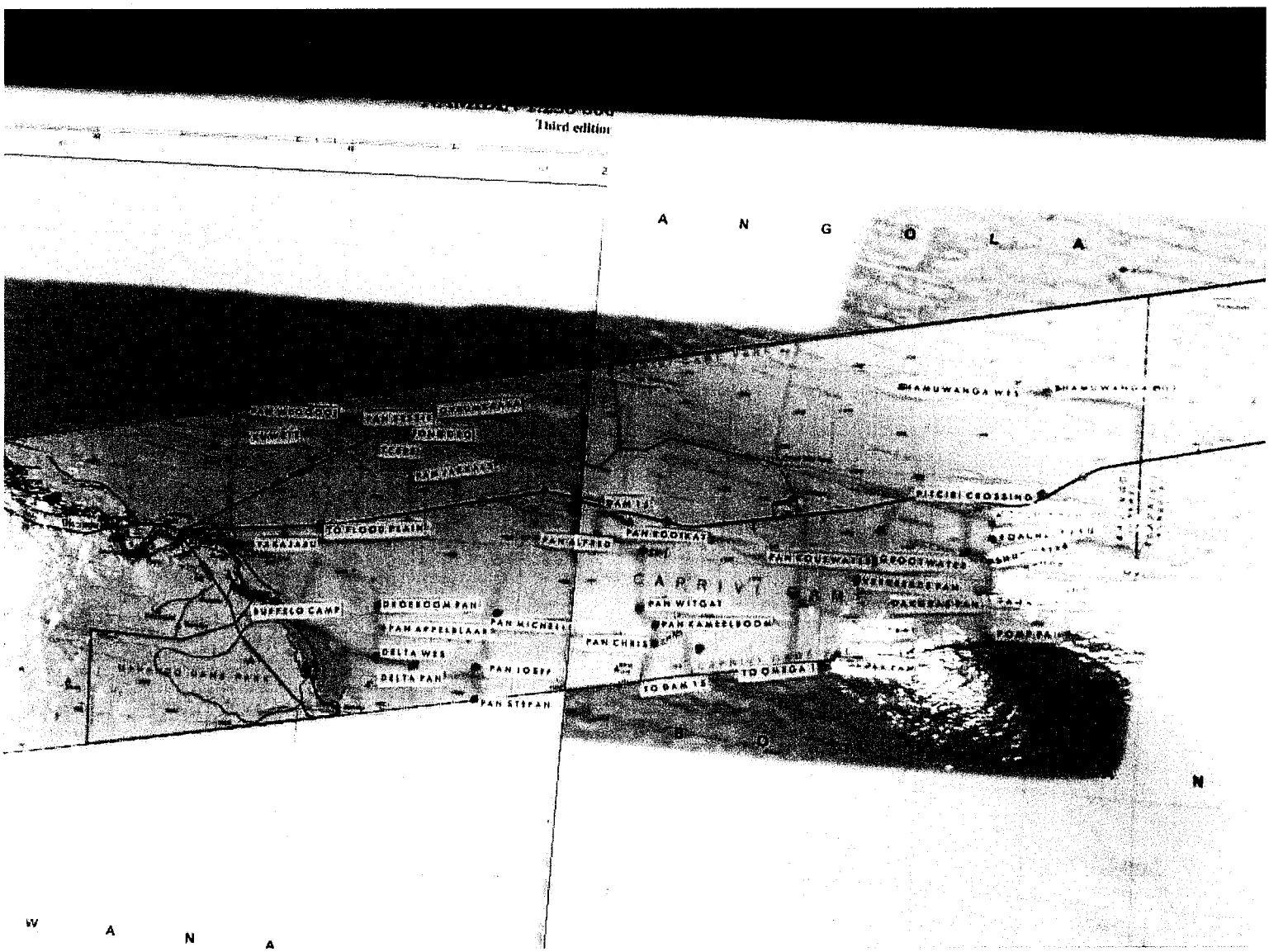
James William Chapman
OPERATOR – FULL NAME (PLEASE PRINT)

Mr.
TITLE

SIGNATURE

https://huntafricanamibia.com/
OPERATOR WEBSITE


ANGOLA
Bwabwata National Park
Omega
Omega III
NAMIBIA
BOTSWANA
NAMIBIA


Third edition
A N G O L A
PANDAMATENGA
PAN ALFRED
PAN WITGAT
PAN KAMEELBOOM
PAN CHRIS
PAN IOSEF
PAN STEFAN
TO OMEGA I
TO BAR 15
B O
N
W A N A

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) [redacted] _____

Name: _Stan S Studer Jr_____

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

SSC Species Survival Commission

AFRICAN ELEPHANT SPECIALIST GROUP

COUNTRY

Namibia

ESTIMATED TOTAL ELEPHANTS

22,754 ± 4,305

GUESSES

90 - 90

GENERAL STATISTICS

Country Area	825,418 km²
Range Area	164,069 km² (20%)
Protected Range	18 %
Information Quality Index (IQI)	0.43
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Namibia's elephants occur across the northern region of the country, mostly in national parks and community areas. Their range encompasses a wide variety of habitats, from the extremely arid north-west Kunene Region to the well-watered Zambezi (formerly Caprivi) Region, where the elephants form part of the KAZA transfrontier population. Although poaching has increased in the Zambezi Region in the past ten years, it is not seen as a significant threat in Etosha National Park or for populations in Khaudum National Park and Kunene Region.

Elephant hunting takes place in Namibia, and the revenue generated provides significant income to community conservancies (Naidoo et al., 2006). From 2007 to 2015, Namibia declared an annual export quota of elephant hunting trophies of 180, defined as tusks from 90 animals (CITES, n.d.-a).

Namibia's elephant management plan was published in 2007 (Ministry of Environment and Tourism, 2007).

In 2008, Namibia undertook an approved one-off sale of 7,503 kg of ivory to Japan and China, at a price of USD $1,147,369 (Wijnstekers, 2011).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Namibia is 22,754 ± 4,305 at the time of the last survey for each area. There may be an additional 90 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 84,283 km^2, which is 52% of the estimated known and possible elephant range. There remains an additional 48% of the estimated range for which no elephant population estimates are available.

The elephant population of Namibia has continued to increase although, with wide confidence limits in aerial surveys and elephants moving across international borders, it is not possible to be precise about how great the increase in the national population has been.

There are four main populations, the transfrontier population (with Zambia, Angola, Botswana and Zimbabwe) in the Zambezi Region, in Khaudum National Park in the north-east, the Etosha National Park population, and the Kunene population in the north-west which includes the "desert" elephants.

There has been an increasing trend in elephant numbers in the Zambezi Region since surveys started in the 1980s. This is likely to have been a result of both natural growth and movement from neighbouring countries. **Aerial sample counts** were carried out in 2007, 2011, 2013, 2014, and 2015, giving estimates of 8,380, 10,847 ± 3,580, 9,165 ± 2,016, 14,097 ± 2,678 and 13,116 ± 3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725 ± 2,206 (Kolberg, 2004). There was also a total count carried out in 2007 (Chase, 2007) and a sample count in 2008 (Kolberg, 2008). However the latter was carried out with an inexperienced crew and the results were thought to be a considerable underestimate (Kolberg, 2008).

The elephant population of Khaudum NP and the neighbouring community conservancies of Nyae Nyae and N≠a Jaqna have been established since the 1980s, with the provision of artificial water and movements across the border from Botswana. Three **aerial sample counts** were carried out in 2011, 2013 and 2015 giving estimates of 4,731 ± 1,940, 3,638 ± 1,164, and 6,413 ± 2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758 ± 2,289 for Khaudum, 61 ± 115 for N#a Jaqna (Kolberg, 2004) and 967 ± 481 for Nyae Nyae (Stander, 2004). None of these are significant differences.

There is a limited movement of elephants between Angola and the Kavango region to the north-west of Khaudum (Terblanche, 2016).

There is a small elephant population in the Mangetti area between Khaudum and Etosha. The AESR 2007 indicated that they occupy the Mangetti Game Reserve, whereas their range is actually concentrated around the Mangetti Cattle Ranch to the west, and also probably extends into the Ukwuangali communal area to the north. Ninety individuals were observed in Mangetti in 2015 (Lindeque, pers. comm., 2016). This **informed guess** replaces one of 20 from 2005 (Ministry of Environment and Tourism, 2005).

NUMBERS AND DISTRIBUTION
CONT.

Etosha National Park in northern Namibia has an increasingly isolated elephant population, since the perimeter fencing has been upgraded in recent years. There has been a gradual increase in elephant numbers, moderated by deaths from anthrax and poaching. Aerial sample counts were carried out in 2011 and 2012, giving estimates of 3,378 ± 1,756 and 2,810 (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of 2,911 ± 637 (Kilian, 2015) and replaces an estimate of 2,057 ± 598 from 2004 (Kilian & Kolberg, 2004).

It is technically very difficult to count the widely scattered elephant population in the Kunene Region, which includes the 'desert elephants' in the dry, western extremity of the range and there has been controversy about the numbers in this area. A combined sample block count and **aerial total count** was carried out by helicopter in 2011, giving an estimate of 314 ± 154 (MET, 2012). This replaces an estimate of 210 ± 157 from a 2005 survey (Ministry of Environment and Tourism, 2005). It should be noted that the count did not include the extreme northern part of the range around Opuwo, nor the farms to the south of Etosha. There has been some range expansion to both the south and north, with elephants now being resident in the Ugab river basin and about ten elephants resident in the northern Etanga area (Owen-Smith, pers. comm., 2014). The area of **known range** has been changed, and the Etanga group is shown as a point record on the map. The Kunene population appears to have been increasing in numbers and range, despite evidence that the 'desert elephant' sub-population in the Hoanib and Hoarusib dry riverbeds reduced from 42 to 31 between 2002 and 2015 (Ramey & Brown, 2015).

There are occasional sightings of elephants in livestock ranching areas to the south of their normal range in the area north and east of Windhoek. These are shown as point records on the range map (Hartman, 2014; The Namibian, 2014).

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
Totals 2015	**22,754**	**4,305**	**90**	**90**		
Totals 2006	**15,807**	**3,276**	**20**	20		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
Total Range					100 %	164,069

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
Totals	+6,947	±5,410	+70	+70	52 %	84,283

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Direct Sample and Reliable Dung	65,438	2,683	68,121
Informed Guesses	15,903	259	16,162
Unassessed Range	31,130	48,655	79,786
Totals	112,471	51,598	164,069

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB	YEAR	ESTIMATE	± 95% CL			(km²)	LON	LAT
Etosha National Park	RS	AS	B	2015	2,911	637	Kilian, 2015	1	18,549	15.8°E	19.0°S
Khaudum-Kavango	RS	AS	B	2015	4,149	1,864	Gibson & Craig, 2015b	2	5,843	20.7°E	19.3°S
Kunene	RS	AS	B	2011	314	154	MET, 2012	1	40,887	14.1°E	20.0°S
Mangetti Area	NG	O	D	2015	90		Lindeque, pers. comm., 2016	2	2,558	18.5°E	18.6°S
Nyae Nyae Conservancy	RS	AS	B	2015	2,264	1,729	Gibson & Craig, 2015b	2	7,001	20.7°E	19.3°S
Zambezi Region	RS	AS	B	2015	13,116	3,413	Gibson & Craig, 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

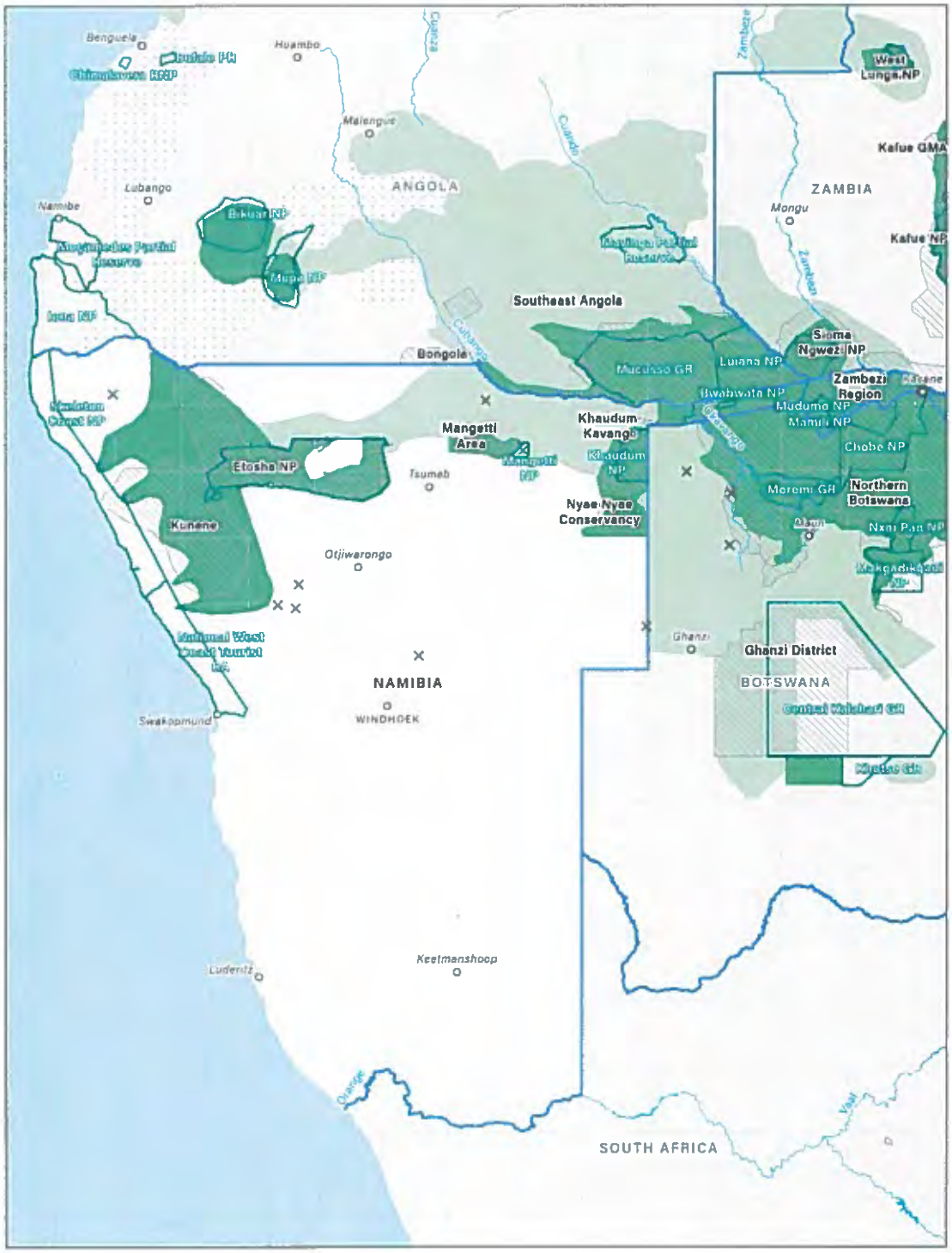
KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

Namibia



0 90 180 270 360 450 540km

Int'l Boundaries
Rivers & Lakes
Towns
Protected Areas
Input Zones

ELEPHANT RANGE
Known
Possible
Doubtful
Sighting

ABBREVIATIONS AND ACRONYMS

See Appendix III for map abbreviations and acronyms

AfESG

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Form 3-200-20

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

RCVD JUN 14 2018 LB

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

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Studer	Stanley	Sawyer	Jr.

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
San Antonio	TX	78209	Bexar	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

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 (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 heards 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 gaurds 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: (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 v.5/8/18
Operator Enhancement Questionnaire

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^2: 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

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	Dense 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:[2]

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

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 Enviorment_____

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: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated				
Vehicles confiscated				
Bicycles confiscated				

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Boats/nets confiscated				
Tusks recovered				
Carcasses observed				
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? __ Yes

b. If so, what percentage or amount is shared, how often, and why 2 Miljlion 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	-			

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

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			
Construction materials donated	N$500,000			
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 Enviorment 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: _____ Title: _____

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			
Construction materials donated	N$500,000			
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 Enviorment 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. CRAFFORD Title: Co-owner of Concession

MacDonald, Tim <tim_macdonald@fws.gov>

US FWS Hunting Permit Applicaiton

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Mon, Sep 30, 2019 at 2:38 PM
To: (b) (6)

Stanley,

U.S. Fish and Wildlife Service Prt # 95151C

On **06/14/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 95151C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

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† JAMES G. TEER, PH.D.
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SHANE MAHONEY
RENEE SNIDER

October 3, 2019

TRANSMISSION VIA EMAIL: tim_macdonald@fws.gov
Department of the Interior
Mr. Tim MacDonald
Government Information Specialist
Division of Management Authority
Branch of Permits; MS: IA
US Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, VA 22041-3805

RE: CONFIRMATION OF SPORT-HUNTED TROPHY IMPORT APPLICATION
PRT NO.: 95151C
APPLICANT NAME: STAN STUDER

Dear Mr. Mac Donald:

In response to your email dated September 30, 2019, please note that Applicant did harvest an Elephant on July 12, 2018, at Bwabwata West National Park in Namibia.

Please do not hesitate to contact us if you have any additional questions about this Application.

Sincerely,

/s/ Emma Sampson
Emma C. Sampson
Permits Department

JJJ/ecs

cc File
Mr. Stan Studer [*via* (b) (6) [redacted]

3240 S I-10 Service Road W, Suite 200 • Metairie, Louisiana 70001 • USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

[EXTERNAL] Re: Supplement for Permit #95150C and #95151C Ross and Stanley Studer

Aimee Korver <permits@conservationforce.org>

Wed 7/1/2020 2:50 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>; (b) (6)
(b) (6)

2 attachments (1 MB)

SupplementtoStanStuder#95151C.pdf; SupplementRossStuder#95150C (2).pdf;

Ms. Brisendine,

I am submitting the supplement information for after the hunt for both Ross and Stanley Studer. I had put the wrong year of the hunt on the first letter. The year of the hunt for both applicants was 2018. Would you please submit these letters in replacement of the previous ones?

Let me know that you have received this and if you have any questions. All of the hunting permits were included in the last e-mail- but I can forward anything you may need again.

Kindest Regards,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

> On June 30, 2020 at 11:54 AM Aimee Korver <permits@conservationforce.org> wrote:
>
> Ms. Brisendine,
>
> Please see the attached supplements to the import permit applications #95150C and #95151C for Ross and Stanley Studer.
>
> Please let me know that you have received these documents and if you have any questions.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
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SHANE MAHONEY
RENEE SNIDER

June 30, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-MAIL: amy_brisendine@fws.gov

RE: PRT # 95151C, applicant Stanley Studer for an elephant trophy import from Namibia
Supplement to Existing Application

Ms. Brisendine:

This is a supplement to the existing application, PRT #95151C, for Stanley Studer for his elephant trophy from Namibia

Answers to Question 6 of the import permit application:

6a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Bwabwata West National Park, hunting concession – GPS Coordinates
S 18 09C 162
E 021 42C 495

6b. Date wildlife was hunted:

July 18, 2018

6c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Huntafrica Namibia. P.H.- J.H. Pienaar Sr.

6d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document

Buffalo Camp, Divundu, Okavango 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).

Please see the attached permits

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].Name:Business Name:Address:City:State/Province:Country, Postal Code

Shipper –
Trophaendienste – Louw Nel
P O Box 21068
Windhoek
Namibia

Professional Hunter –
J.H. Pienaar, Sr.
Namibia

In addition, we would like to include an operator enhancement report for Huntafrica Namibia that has been updated this year.

Please refer to the numerous documents and responses previously submitted to FWS by Conservation Force, Professional Hunters, Operators and Professional Hunting Organizations, as well as information submitted by the government authorities of Namibia, which demonstrate that Elephant hunting programs are well managed, and the hunting enhances the survival of the species in making an enhancement determination for this import.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. Stanley Studer w/attachments

Enclosures:
a. Operator Enhancement Report-Hunt Africa Namibia with map
b. Hunting Permits- Stanley Studer

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: PAUL K. MONSEN

Date: 05/11/18

Form 3-200-20

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

Federal Fish and Wildlife Permit Application Form

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

RCVD JUN 14 2018

LB

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

Type of Activity:

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

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

A. Complete if applying as an individual			
1.a. Last name: MONSEN	1.b. First name: PAUL	1.c. Middle name or initial: K	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: SALT LAKE CITY	1.c. State: UT	1.d. Zip code/Postal code: 84109	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 – ***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 [redacted] 05/11/2018
	Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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

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

---

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

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)? PAUL MON (b) (6) [redacted]

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No _x_ Yes ____

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name. ELEPHANT
   LOXODANTA 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:
   SANGO, SAVE VALLEY CONSERVANCY
   PROVINCE: MASVINGO. NEAREST TOWN MASVINGO

   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 CHINAMANO ROAD
   BELMONT, BULAWAYO, ZIMBABWE

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

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

Name:
Business Name: TROPHY CONSULTANTS INTERNATIONAL
Address: 4 JOSIAH CHINAMANO ROAD, BELMONT
City: BULAWAYO
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 CPLMA + 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 signatu (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).

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				NIL
Lion				PAID
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? USD

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)			2000	MAINTENANCE, DESKS, CHAIRS
Education (e.g., school fees, supplies)			1000	EXERCISE BOOKS PENS 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

h. Do you offer rewards to poaching informants upon conviction? __ Yes X 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~~	
~~Petrol~~ DIESEL			~~3 000~~ 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:[3]

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Professional Hunters	CONTRACTED	
Trackers	CONTRACTED	
Anti-poaching scouts/rangers	44	
Other anti-poaching	0	MAJORITY
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	AS	ABOVE	
Road opening/construction			
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: 44

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? 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? X Yes __ No

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

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: SANGO Size in km²: 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: ~~CHIREDZI~~ 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:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	DENSE	684	UP	AERIAL COUNT
Lion	DENSE	120	UP	"
Leopard	DENSE	147	UP	"
Prey species	DENSE		STABLE	"

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

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

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 th[redacted]ct.

Signature: (b) (6)

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.	No. 17-cv-002530-RCL
Ryan ZINKE, *et al.*,	Judge Royce Lamberth
Defendants, and	
SAFARI CLUB INTERNATIONAL *et al.*,	
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^2 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 re-colonize 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

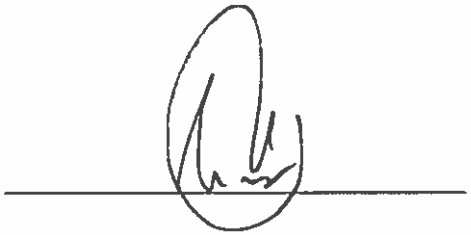
and schools, providing computer equipment, etc. SVC entered into an agreement with local Chiefs to share revenues from regulated hunting and sales of game meat.

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



Wilfried Pabst

COUNTRY

Zimbabwe

ESTIMATED TOTAL ELEPHANTS

82,630 ± 8,589

GUESSES

1,635 - 1,805

GENERAL STATISTICS

Country Area	390,580 km²
Range Area	81,228 km² (21%)
Protected Range	61 %
Information Quality Index (IQI)	0.86
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Poaching of elephants for ivory has escalated in the past ten years and has become a major problem in Zimbabwe. A worrying recent development has been the emergence of poisoning as a poaching technique. Just over 100 elephants were killed in a single cyanide poisoning incident in Hwange National Park in late 2013 (Muboko et al., 2014). The impact of poaching has been highest in the north of the country, particularly in the Sebungwe Region to the south of Lake Kariba, and the Lower Zambezi Region (Dunham et al., 2015c). Although elephant numbers have increased in Gonarezhou National Park, it too experienced an increase in poaching in 2015 (Dunham & van der Westhuizen, 2015).

Concern has been expressed about the impact of high numbers of elephants on vegetation and other biodiversity in Zimbabwe's protected areas. Despite the increase in poaching, this remains a problem in protected areas such as Hwange NP, where the provision of artificial water supplies has led to high elephant densities (ZPWMA, 2015).

Zimbabwe published a national elephant management plan covering the period 2015 to 2020 (ZPWMA, 2015).

In 2008, Zimbabwe undertook an approved one-off sale of 3,764 kg of ivory to Japan and China, at a price of USD $487,162 (Wijnstekers, 2011).

Zimbabwe's annual declared export quota of elephant trophies remains unchanged since 2007 at 1,000 (tusks as hunting trophies from 500 animals) (CITES, n.d.-b). In 2015, the US Fish and Wildlife Service removed its 'non-detriment' finding, thus banning the import of elephant trophies into the USA (USFWS, 2015a).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Zimbabwe is 82,630 ± 8,589 at the time of the last survey for each area. There may be an additional 1,635 to 1,805 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 78,839 km², which is 97% of the estimated known and possible elephant range. There remains an additional 3% of the estimated range for which no elephant population estimates are available.

There has been a decline of just over 10,000 elephants from surveyed populations since the AESR 2007 and an increase of about 1,000 in guesses, mostly from previously unsurveyed areas in North West Matabeleland. Although there have been large losses from the Sebungwe and Lower Zambezi populations, these have been partially compensated by increases in Gonarezhou and North West Matabeland.

The major populations of the Lower Zambezi Valley (including Mana Pools National Park), Sebungwe (including Matusadona and Chizarira National Parks), North-west Matabeleland (including Hwange and Zambezi National Parks) and the south-east Lowveld (including Gonarezhou NP) were surveyed in 2014 using **aerial sample counts** (including block counts in hilly areas) as part of the Great Elephant Census.

The estimate from the Lower Zambezi Valley in 2014 was 11,656 ± 2,259 (Dunham et al., 2015c). The previous comparable estimate was 19,297 ± 2,527 in 2001 (Mackie, 2002). The 2014 figure replaces an estimate from the AESR 2007 of 19,981 ± 2,392 from 2003 (Dunham, 2004). This survey was less comparable than the 2001 one because it covered a slightly smaller area. There was an approximately 40% decline in the 13 years between 2001 and 2014. The observed carcass ratio of 6% is not as high as one would expect given the rate of population reduction and might suggest that the level of poaching has reduced in recent years. The corridor between the Mavuradonha Wilderness Area and the rest of the Zambezi Valley range has been changed to **possible range** (Packenham quoting Varden, pers. comm., 2016).

The 2014 estimate for Sebungwe was 3,407 ± 1,215 (Dunham et al., 2015b) which replaces an estimate of 15,024 ± 2,133 from a 2006 survey (Dunham et al., 2006a). The observed carcass ratio of 30% indicates an unsustainably high offtake of elephants. There were almost no elephants left in the communal areas, with the main surviving sub-populations in Matusadona and Chizarira National Parks and the Chirisa Safari Area. Wildlife scouts reported 70-100 elephants in Kavira Forest Land at the western end of Sebungwe (M. Sebele pers. comm. in Dunham et al., 2015b).

The 2014 estimate for North-west Matabeleland was 53,991 ± 7,711 (Dunham et al., 2015a), which replaces an estimate of 49,310 ± 7,051 from 2001 (Dunham & Mackie, 2002). There was no significant difference between the totals although the increased carcass ratio of 7% from 3% in 2001 is a worrying sign. Other aerial sample counts were carried out in 2006 and 2007 but they were not

suitable for comparative purposes (Dunham et al., 2007; Dunham et al., 2006b). Since the 2014 Botswana survey was carried out a month earlier than the north-west Matabeleland survey there is a possibility of double-counting or missing animals that had moved from Hwange into Botswana. There was a surprisingly large number of elephants seen in the Ngwasho/Sepako stratum in Botswana adjoining the southern half of Hwange NP (estimate 11,744) (Chase et al., 2015) and evidence from radio-tracking shows that elephants do move out of Hwange into adjoining areas of Botswana (Chamaillé-Jammes, pers. comm., 2016; Ferguson & Chase, 2010).

Elephant range in North-west Matabeleland has probably increased. Water hole counts and scout reports indicated 308 elephants in the Fuller Forest Land, 165 in Gwaai, Bembezi and Umguza Forest Lands (which has been marked as new **known range**) and 150 in Gwampa/Lake Alice Forest Reserves (M. Sebele pers. comm in Dunham et al., 2015a) which are all recorded as **new populations**. I. Du Preez (pers. comm. in Dunham et al., 2015a) reported an **informed guess** of 36 elephants in the privately owned Stanley & Livingstone Game Reserve (Nakavango).

The estimate for Gonarezhou NP from the 2014 survey was 11,120 ± 2,709 (Dunham & van der Westhuizen, 2015). This replaces an estimate of 4,987 ± 1,577 from a comparable 2001 survey. Another survey in 2009 gave an estimate of 9,123 ± 1,898 (Dunham et al., 2010). The elephant population of Gonarezhou NP is continuing to increase, and is at its highest level since surveys started in 1980. There was a relatively low carcass ratio of 4%. There are limited movements of elephants from Gonarezhou into adjoining parts of Mozambique, and one radio-collared elephant moved from Kruger to Gonarezhou (Henley, 2011).

The 2014 survey of the south east Lowveld included some neighbouring areas. No elephants were observed in the Malapati Safari Area immediately south-west of Gonarezhou but there was an estimate of 332 ± 519 in the Mahenye communal land to the north-east of Gonarezhou, which replaces a zero estimate from the 2001 survey. The 2014 survey gave an estimate of 1,585 ± 1,295 for the Savé Valley Conservancy. This replaces an estimate of 527 ± 310 (Dunham, 2003). There is no statistical difference between the two results. Aerial total counts were carried out in 2013 and 2015 (Jooste & Lenton, 2015; Joubert & Joubert, 2013), which did not cover the entire area: 1,538 and 1,490 elephants were counted respectively. Sengwe, further to the south-west, adjoining the northern boundary of Kruger National Park in South Africa, was not counted in the 2014 survey, but there was an estimate of 35 ± 99 in 2013 (Dunham et al., 2013). In the Malilangwe Conservancy 272 elephants were counted using a helicopter in 2013 (Clegg, 2013). This replaces an estimate of 116 from an aerial total count in 2001 (Dunham, 2002). There was an estimate of 55 in 2014 for the Chiredzi River Conservancy (Warth in Dunham & van der Westhuizen, 2015) compared to 28 in 2001 (Dunham, 2002). Although Chipinge Safari Area is marked as possible elephant range, this is now highly unlikely.

There are a number of small isolated populations in other parts of Zimbabwe, which have updated estimates for 2014. There is an informed guess of 150 elephants for Chegutu Safari Area (Mwale, pers. comm. in Dunham, 2015), formerly Hartley Safari Area, west of Harare and this replaces a guess of 100 from 2001 (Dunham & Mackie, 2002). Some 30 elephants reportedly move from the Nyatana Wildlife Management Area in the north east of the country into Mozambique and this replaces a guess of 150 from 2001 (Dunham & Mackie, 2002).

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 Bubye Valley (Leathem & English pers. comm. in Dunham, 2015), and 100 on Bubiana Conservancy (Drummond pers. comm. in Dunham, 2015) in the south of Zimbabwe, replacing guesses of 53 and 50 respectively (Dunham & Mackie, 2002). An old estimate of ten elephants in the Mambali Communal Lands on the Botswana border has been retained from the AESR 2007 (Dunham & Mackie, 2002). A report of 54 elephants on Nuanetsi Ranch is recorded as a **new population**.

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Total Counts	484	—	—	—	1 %	819
Aerial Sample Counts	82,126	8,589	—	—	81 %	65,502
Informed Guesses	20	—	527	567	5 %	3,777
Other Guesses	—	—	1,091	1,221	10 %	8,399
Degraded Data	—	—	17	17	0 %	342
Totals 2015	**82,630**	**8,589**	**1,635**	**1,805**		
Totals 2006	**93,122**	**7,068**	**534**	**625**		
Assessed Range					97 %	78,839
Unassessed Range					3 %	2,389
Total Range					100 %	81,228

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	-10,320	±11,124	0	0	79 %	63,868
New Population	0	0	+713	+713	6 %	4,563
Different Technique	+7	±99	-145	-145	4 %	3,370
Different Area	+20	0	-3	+36	0 %	33
New Guess	-182	0	+519	+559	8 %	6,662
Data Degraded	-17	0	+17	+17	0 %	0
Totals	-10,492	±11,124	+1,101	+1,180	97 %	78,839

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Aerial or Ground Total Counts	819	0	819
Direct Sample and Reliable Dung	65,375	127	65,502
Informed Guesses	3,745	32	3,777
Other Guesses	8,741	0	8,741
Unassessed Range	1,533	857	2,389
Totals	80,213	1,016	81,228

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL			(km²)	LON	LAT.
Chegutu Safari Area	NG	O	E	2014	150		Dunham, 2015	2	445	29.6°E	17.9°S
Greater Mapungubwe											
Tuli, Maramani, Sentinel, Nottingham	RS	AT	A	2014	212		Seier & Page, 2015	2	1,192	29.4°E	22.0°S
Lower Zambezi Valley											
Chewore II	RS	AS	B	2014	594	333	Dunham et al., 2015c	2	1,058	29.9°E	16.1°S
Chewore I & III	RS	AS	B	2014	2,709	851	Dunham et al., 2015c	2	1,773	29.9°E	16.1°S
Chewore IV	RS	AS	B	2014	0		Dunham et al., 2015c	3	472	29.9°E	16.1°S
Doma Safari Area	RS	AS	B	2014	153	194	Dunham et al., 2015c	2	991	29.9°E	16.1°S
Mavuradonha Wilderness Area	RS	AS	B	2014	0		Dunham et al., 2015c	2	652	29.9°E	16.1 S
Mukwiche Area	RS	AS	B	2014	0		Dunham et al., 2015c	3	337	29.9°E	16.1 S
Protea Farm	-	O	E	2001	7		Dunham & Mackie, 2002	4	14	29.6°E	16.5°S
Rest of Zambezi valley	RS	AS	B	2014	8,200	2,029	Dunham et al., 2015c	1	11,720	29.9°E	16.1 S
Mambali Communal Lands	-	AT	E	2001	10		Dunham & Mackie, 2002	2	327	28.4°E	21.5°S
Mangwe Dam	DA	O	D	2014	20	40*	Dunham, 2015	3	291	28.1°E	20.7°S
Northwest Matabeleland											
Fuller Forest Land	NP	O	D	2014	308		Dunham, 2015	3		25.9°E	18.1°S
Gwaai, Bembesi, and Umguza Forest Lands	NP	O	D	2014	165		Dunham, 2015	2	1,442	28.0°E	19.3°S
Gwampa/Lake Alice Forest Lands	NP	O	E	2014	150		Dunham, 2015	2	860	28.5°E	19.1°S
Hwange National Park	RS	AS	B	2014	45,846	6,244	Dunham et al., 2015a	1	15,168	26.4°E	18.8°S
Matabeleland Communal areas	RS	AS	B	2014	2,201	3,062	Dunham et al., 2015a	2	3,075	26.4°E	18.8°S
Matetsi Safari Complex	RS	AS	B	2014	4,843	2,968	Dunham et al., 2015a	1	4,384	26.4°E	18.8°S
Nakavango	NP	O	E	2014	36		Dunham, 2015	3		25.8°E	18.0°S
Ngamo & Sikumi Forest Areas	RS	AS	B	2014	1,101	993	Dunham et al., 2015a	2	2,332	26.4°E	18.8°S
Nyatana Wildlife Management Area	NG	O	E	2014	30		Dunham, 2015	2	651	32.5°E	16.7°S
Sebungwe											
Binga Communal Lands	RS	AS	B	2014	86	162	Dunham et al., 2015b	2	2,201	28.2°E	17.4°S
Chete Safari Area	RS	AS	B	2014	278	222	Dunham et al., 2015b	2	1,242	28.2°E	17.4°S
Chirisa Safari Area	RS	AS	B	2014	1,200	755	Dunham et al., 2015b	2	1,530	28.2°E	17.4°S
Chizarira National Park	RS	AS	B	2014	747	767	Dunham et al., 2015b	2	2,096	28.2°E	17.4°S
Kariba Communal Areas	RS	AS	B	2014	411	364	Dunham et al., 2015b	2	3,198	28.2°E	17.4°S
Kavira Forest Land	NG	O	E	2014	70	30*	Dunham et al., 2015b	2	287	27.0°E	18.1°S
Lusulu	RS	AS	B	2014	0		Dunham et al., 2015b	2	537	28.2°E	17.4°S

ELEPHANT ESTIMATES (CONT.)

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB	YEAR	ESTIMATE	± 95% CL			(km²)	LON.	LAT.
Matusadona National Park	RS	AS	B	2014	669	251	Dunham et al., 2015b	2	1,366	28.2°E	17.4°S
North Gokwe Communal Lands	RS	AS	B	2014	0	21	Dunham et al., 2015b	2	3,096	28.2°E	17.4°S
Sijarira Forest Area	RS	AS	B	2014	16		Dunham et al., 2015b	3	261	28.2°E	17.4°S
Shangani Ranch	NG	O	E	2014	174		Dunham, 2015	2	628	29.3°E	19.6°S
Southeast Lowveld											
Bubiana Conservancy	NG	O	E	2014	100		Dunham, 2015	2	1,772	29.8°E	21.1°S
Bubye Valley Conservancy	NG	O	E	2014	500	100*	Dunham, 2015	1	2,895	30.1°E	21.5°S
Chiredzi River Conservancy	DT	O	E	2014	55		Dunham, 2015	2	895	31.6°E	20.8°S
Gonarezhou National Park	RS	AS	B	2014	11,120	2,709	Dunham & van der Westhuizen, 2015	1	4,941	31.9°E	21.5°S
Mahenye Ward	RS	AS	B	2014	332	519	Dunham & van der Westhuizen, 2015	3	221	31.9°E	21.5°S
Malapati Safari Area	RS	AS	B	2014	0		Dunham & van der Westhuizen, 2015	3	177	31.9°E	21.5°S
Malilangwe Conservancy	RS	AT	A	2013	272		Clegg, 2013	3	425	31.9°E	21.1°S
Matibi II Communal Lands	-	AS	E	1996	0		Davies et al., 1996	3	400	31.7°E	21.5°S
Nuanetsi Ranch	NP	O	D	2014	54		Dunham, 2015	2		30.8°E	21.6°S
Save Valley Conservancy	RS	AS	B	2014	1,585	1,295	Dunham & van der Westhuizen, 2015	2	3,496	32.1°E	20.4°S
Sengwe Communal Land	DT	AS	B	2013	35	99	Dunham et al., 2013	2	2,488	31.8°E	21.6°S

*RANGE OF INFORMED GUESS

*KEY TO REASONS FOR CHANGE

DA: Different Area; DD: Data Degraded; DT: Different Technique; NA: New Analysis; NG: New Guess; NP: New population; PL: Population Lost; RS: Repeat Survey (RS denotes a repeat survey that is not statistically comparable for reasons such as different season);
— : No Change

*KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst)

*PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

Zimbabwe

AfESG

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CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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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)

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

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: (b) (6) [redacted]

Name: Amy Lally Dement

Date: 05/10/2018

Form 3-200-20

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

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

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:

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

RCVD 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
DEMENT	AMY	LALLY	

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

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

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

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
OAKFIELD	TN	38362	MADISON	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
MEDINA	TN	38355	GIBSON	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18

(b) (6)

05/10/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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

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

---

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

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

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   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 Thornahlen; Name of Safari Company – Thornahlen & 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@africanshippingservices.com
Tel: +264 61 305821

PROFESSIONAL HUNTER:
Anton Mynhardt Alberts
92 Nelson Mandela Ave.
Stillwater #5
Klein Windhoek
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#a 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 ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: (b) (6) _____ 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

SSC Species Survival Commission

AFRICAN ELEPHANT SPECIALIST GROUP

COUNTRY

Namibia

ESTIMATED TOTAL ELEPHANTS

22,754 ± 4,305

GUESSES

90 - 90

GENERAL STATISTICS

Country Area	825,418 km²
Range Area	164,069 km² (20%)
Protected Range	18 %
Information Quality Index (IQI)	0.43
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Namibia's elephants occur across the northern region of the country, mostly in national parks and community areas. Their range encompasses a wide variety of habitats, from the extremely arid north-west Kunene Region to the well-watered Zambezi (formerly Caprivi) Region, where the elephants form part of the KAZA transfrontier population. Although poaching has increased in the Zambezi Region in the past ten years, it is not seen as a significant threat in Etosha National Park or for populations in Khaudum National Park and Kunene Region.

Elephant hunting takes place in Namibia, and the revenue generated provides significant income to community conservancies (Naidoo et al., 2006). From 2007 to 2015, Namibia declared an annual export quota of elephant hunting trophies of 180, defined as tusks from 90 animals (CITES, n.d.-a).

Namibia's elephant management plan was published in 2007 (Ministry of Environment and Tourism, 2007).

In 2008, Namibia undertook an approved one-off sale of 7,503 kg of ivory to Japan and China, at a price of USD $1,147,369 (Wijnstekers, 2011).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Namibia is 22,754 ± 4,305 at the time of the last survey for each area. There may be an additional 90 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 84,283 km^2, which is 52% of the estimated known and possible elephant range. There remains an additional 48% of the estimated range for which no elephant population estimates are available.

The elephant population of Namibia has continued to increase although, with wide confidence limits in aerial surveys and elephants moving across international borders, it is not possible to be precise about how great the increase in the national population has been.

There are four main populations, the transfrontier population (with Zambia, Angola, Botswana and Zimbabwe) in the Zambezi Region, in Khaudum National Park in the north-east, the Etosha National Park population, and the Kunene population in the north-west which includes the "desert" elephants.

There has been an increasing trend in elephant numbers in the Zambezi Region since surveys started in the 1980s. This is likely to have been a result of both natural growth and movement from neighbouring countries. **Aerial sample counts** were carried out in 2007, 2011, 2013, 2014, and 2015, giving estimates of 8,380, 10,847 ± 3,580, 9,165 ± 2,016, 14,097 ± 2,678 and 13,116 ± 3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725 ± 2,206 (Kolberg, 2004). There was also a total count carried out in 2007 (Chase, 2007) and a sample count in 2008 (Kolberg, 2008). However the latter was carried out with an inexperienced crew and the results were thought to be a considerable underestimate (Kolberg, 2008).

The elephant population of Khaudum NP and the neighbouring community conservancies of Nyae Nyae and N≠a Jaqna have been established since the 1980s, with the provision of artificial water and movements across the border from Botswana. Three **aerial sample counts** were carried out in 2011, 2013 and 2015 giving estimates of 4,731 ± 1,940, 3,638 ± 1,164, and 6,413 ± 2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758 ± 2,289 for Khaudum, 61 ± 115 for N#a Jaqna (Kolberg, 2004) and 967 ± 481 for Nyae Nyae (Stander, 2004). None of these are significant differences.

There is a limited movement of elephants between Angola and the Kavango region to the north-west of Khaudum (Terblanche, 2016).

There is a small elephant population in the Mangetti area between Khaudum and Etosha. The AESR 2007 indicated that they occupy the Mangetti Game Reserve, whereas their range is actually concentrated around the Mangetti Cattle Ranch to the west, and also probably extends into the Ukwuangali communal area to the north. Ninety individuals were observed in Mangetti in 2015 (Lindeque, pers. comm., 2016). This **informed guess** replaces one of 20 from 2005 (Ministry of Environment and Tourism, 2005).

NUMBERS AND DISTRIBUTION
CONT.

Etosha National Park in northern Namibia has an increasingly isolated elephant population, since the perimeter fencing has been upgraded in recent years. There has been a gradual increase in elephant numbers, moderated by deaths from anthrax and poaching. Aerial sample counts were carried out in 2011 and 2012, giving estimates of 3,378 ± 1,756 and 2,810 (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of 2,911 ± 637 (Kilian, 2015) and replaces an estimate of 2,057 ± 598 from 2004 (Kilian & Kolberg, 2004).

It is technically very difficult to count the widely scattered elephant population in the Kunene Region, which includes the 'desert elephants' in the dry, western extremity of the range and there has been controversy about the numbers in this area. A combined sample block count and **aerial total count** was carried out by helicopter in 2011, giving an estimate of 314 ± 154 (MET, 2012). This replaces an estimate of 210 ± 157 from a 2005 survey (Ministry of Environment and Tourism, 2005). It should be noted that the count did not include the extreme northern part of the range around Opuwo, nor the farms to the south of Etosha. There has been some range expansion to both the south and north, with elephants now being resident in the Ugab river basin and about ten elephants resident in the northern Etanga area (Owen-Smith, pers. comm., 2014). The area of **known range** has been changed, and the Etanga group is shown as a point record on the map. The Kunene population appears to have been increasing in numbers and range, despite evidence that the 'desert elephant' sub-population in the Hoanib and Hoarusib dry riverbeds reduced from 42 to 31 between 2002 and 2015 (Ramey & Brown, 2015).

There are occasional sightings of elephants in livestock ranching areas to the south of their normal range in the area north and east of Windhoek. These are shown as point records on the range map (Hartman, 2014; The Namibian, 2014).

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
Totals 2015	**22,754**	**4,305**	**90**	**90**		
Totals 2006	**15,807**	**3,276**	**20**	**20**		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
Total Range					100 %	164,069

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
Totals	+6,947	±5,410	+70	+70	52 %	84,283

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Direct Sample and Reliable Dung	65,438	2,683	68,121
Informed Guesses	15,903	259	16,162
Unassessed Range	31,130	48,655	79,786
Totals	112,471	51,598	164,069

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CI			(km²)	LON	LAT
Etosha National Park	RS	AS	B	2015	2,911	637	Kilian, 2015	1	18,549	15.8°E	19.0°S
Khaudum-Kavango	RS	AS	B	2015	4,149	1,864	Gibson & Craig, 2015b	2	5,843	20.7°E	19.3°S
Kunene	RS	AS	B	2011	314	154	MET, 2012	1	40,887	14.1°E	20.0°S
Mangetti Area	NG	O	D	2015	90		Lindeque pers. comm., 2016	2	2,558	18.5°E	18.6°S
Nyae Nyae Conservancy	RS	AS	B	2015	2,264	1,729	Gibson & Craig, 2015b	2	7,001	20.7°E	19.3°S
Zambezi Region	RS	AS	B	2015	13,116	3,413	Gibson & Craig, 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

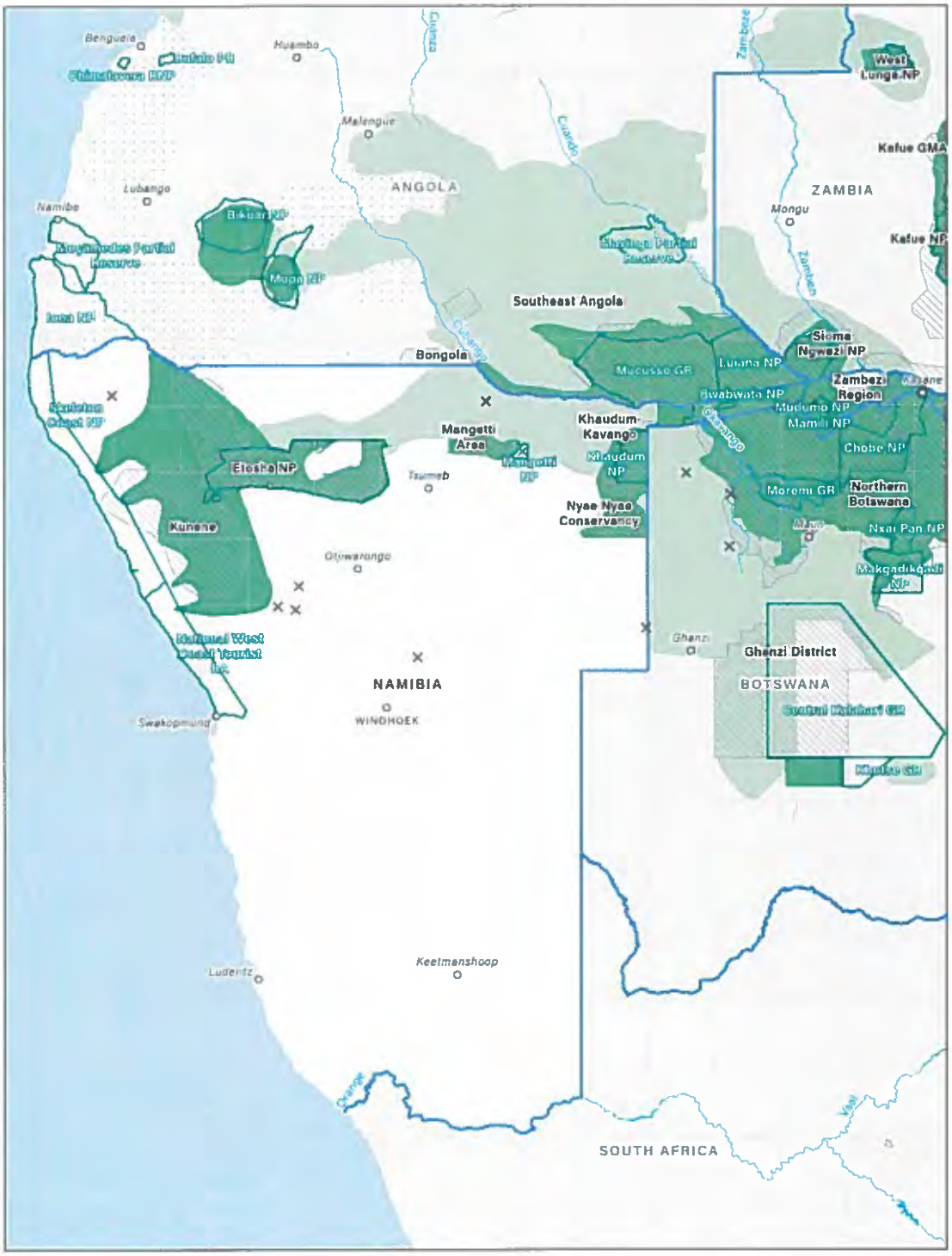
*KEY TO SURVEY REPORT

AS: Aerial Sample Count, AT: Aerial Total Count, DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count, IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

*PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

Namibia



0 90 180 270 360 450 540km

Int'l Boundaries
Rivers & Lakes
Towns
Protected Areas
Input Zones

ELEPHANT RANGE
Known
Possible
Doubtful
Sighting

ABBREVIATIONS AND ACRONYMS

See Appendix III for map abbreviations and acronyms

AfESG

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Conservation Biology

Contributed Paper

Complementary benefits of tourism and hunting to communal conservancies in Namibia

Robin Naidoo,* L. Chris Weaver,† Richard W. Diggle,† Greenwell Matongo,† Greg Stuart-Hill,† and Chris Thouless† ‡

*WWF-US, 1250 24th Street NW, Washington, D.C. 20037, U.S.A., email robin.naidoo@wwfus.org
†WWF in Namibia, P.O. Box 9681, Windhoek, Namibia

Abstract: *Tourism and hunting both generate substantial revenues for communities and private operators in Africa, but few studies have quantitatively examined the trade-offs and synergies that may result from these two activities. We evaluated financial and in-kind benefit streams from tourism and hunting on 77 communal conservancies in Namibia from 1998 to 2013, where community-based wildlife conservation has been promoted as a land-use that complements traditional subsistence agriculture. We used data collected annually for all communal conservancies to characterize whether benefits were derived from hunting or tourism. We classified these benefits into 3 broad classes and examined how benefits flowed to stakeholders within communities under the status quo and under a simulated ban on hunting. Across all conservancies, total benefits from hunting and tourism increased at roughly the same rate, although conservancies typically started generating benefits from hunting within 3 years of formation as opposed to after 6 years for tourism. Disaggregation of data revealed that the main benefits from hunting were income for conservancy management and food in the form of meat for the community at large. The majority of tourism benefits were salaried jobs at lodges. A simulated ban on trophy hunting significantly reduced the number of conservancies that could cover their operating costs, whereas eliminating income from tourism did not have as severe an effect. Given that the benefits generated from hunting and tourism typically begin at different times in a conservancy's life-span (earlier vs. later, respectively) and flow to different segments of local communities, these 2 activities together may provide the greatest incentives for conservation on communal lands in Namibia. A singular focus on either hunting or tourism would reduce the value of wildlife as a competitive land-use option and have grave repercussions for the viability of community-based conservation efforts in Namibia, and possibly other parts of Africa.*

Keywords: communal lands, community-based conservation, financial benefits, hunting ban, in-kind benefits, stakeholders

Resumen: *El turismo y la caza generan ingresos públicos sustanciales para las comunidades y los operadores privados en África, pero pocos estudios han examinado cuantitativamente las compensaciones y las sinergias que pueden resultar de estas dos actividades. Evaluamos las oleadas de beneficios financieros y de pago en especie provenientes del turismo y la caza en 77 zonas de conservación comunal en Namibia desde 1998 a 2013, donde la conservación de vida silvestre basada en la comunidad ha sido promovida como un uso de suelo que complementa la agricultura tradicional de subsistencia. Usamos datos colectados anualmente de todas las zonas comunales para caracterizar si los beneficios se derivaron de la caza o el turismo. Clasificamos estos beneficios en tres categorías generales y examinamos cómo los beneficios fluyeron hacia los accionistas dentro de las comunidades bajo el status quo y bajo una prohibición simulada de la caza. En todas las zonas de conservación comunal, los beneficios totales de la caza y el turismo incrementaron aproximadamente a la misma tasa, aunque en estas zonas se comenzaron a generar beneficios de la caza normalmente dentro de los 3 años de formación, en contraste con del turismo que se generaron después de 6 años. La desagregación de los datos reveló que los principales beneficios de la caza fueron los ingresos para*

‡*Current address: Save the Elephants, Marula Manor, Marula Lane, Karen, P.O. Box 54667, Nairobi 00200, Kenya*
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el manejo de la conservación y la comida en forma de carne para la mayoría de la comunidad. La mayoría de los beneficios del turismo fueron trabajos a sueldo en hospedajes. Una prohibición simulada sobre la caza de trofeos redujo significativamente el número de zonas de conservación que podrían cubrir sus gastos de operación, mientras que la eliminación del ingreso por el turismo no tuvo un efecto severo. Dado que los beneficios generados por la caza y el turismo comienzan comúnmente a tiempos distintos en la duración total de la conservación (más temprano que más tarde, respectivamente) y fluyen a segmentos diferentes de las comunidades locales, estas dos actividades juntas pueden proporcionar incentivos más grandes para la conservación en las tierras comunales de Namibia. Un foco único sobre la caza o el turismo puede reducir el valor de la vida silvestre como opción de uso de suelo competitivo y tener repercusiones graves sobre la viabilidad de los esfuerzos de conservación basada en comunidades de Namibia, y posiblemente de otras partes de África.

Palabras Clave: accionistas, beneficios financieros, beneficios de pago en especie, conservación basada en la comunidad, prohibición de la caza, tierras comunales

Introduction

Current paradigms in conservation increasingly emphasize the utilitarian aspect of safeguarding biodiversity (Daily et al. 2009; Redford & Adams 2009; Guerry et al. 2015), as opposed to more traditional strategies such as protected areas and strict land-use zoning. Ecosystem service approaches and payments for environmental services (PES) schemes are based on the assumption that ensuring a supply of environmental benefits to people will result in the conservation of biodiversity and of natural areas (Tallis et al. 2009; Tallis & Polasky 2009). However, this increasing emphasis on a utilitarian approach to conservation has spawned much debate and criticism. Some contend this new conservation diverts efforts away from ensuring the persistence of biodiversity and puts too much focus on human needs and well-being (Soule 2013; Doak et al. 2014). Others argue that PES programs and partnerships with corporations are resulting in the commodification of nature and that market-based approaches are likely to favor the rich, powerful, and foreign at the expense of local communities and the poor (Sullivan 2006; Igoe et al. 2010).

Although approaches to natural resource management and biodiversity conservation in southern Africa have long been grounded in similar utilitarian perspectives (Child 2004; Carruthers 2008), few approaches to conservation are currently as controversial as the hunting of large and charismatic species as a means of generating benefits and incentives for conservation in this part of the world (Lindsey et al. 2006; Lindsey et al. 2007). Heightened concerns surrounding animal rights and the ethics of hunting, often inflamed by images on social media of trophy hunters posing with dead animals, have led to an increasingly vocal Western opposition to trophy hunting in Africa. This opposition is contributing to tangible policy changes, including the banning of trophy hunting in Botswana (Pabst 2013), restrictions on imports of trophies of certain species to countries such as the United States and Australia (Milman 2015), and the barring of trophies from being transported on some major commercial airlines (Wieczner 2015). Ironically, this Western opposition to trophy hunting comes despite the fact that hunting benefits were one of the early motivations for conservation in North America (Geist et al. 2001), and even today proceeds from hunting licenses in the United States (via the Pittman-Robertson Act) and Canada continue to generate hundreds of millions of dollars every year for wildlife management and habitat protection (Arnett & Southwick 2015).

The impact that changes in hunting policies may have on the conservation of wildlife and on the incentives for African people to coexist with wildlife is not well understood (Buckley & Mossaz 2015). There has been little examination of how benefits from hunting compare with benefits from nonconsumptive nature-based tourism in terms of incentives for local people to conserve species and wildlife habitat, although others have suggested the two may be complementary, rather than substitutive, activities (Leader-Williams et al. 2001; Lindsey et al. 2006). A major limitation is that data on the variety of financial benefits that wildlife generate are typically not systematically collected, especially across different temporal and spatial scales. Yet understanding who benefits, and how, from wildlife as a land use is a critical prerequisite to designing effective policies and programs that support conservation as a sustainable alternative to other, less biodiversity friendly, land uses.

Despite the above knowledge gaps, it is clear that for wildlife to survive outside (and perhaps even inside) protected areas in Africa, people must have strong incentives to tolerate, or ideally embrace, wildlife as a land use (Roe et al. 2009; Dickman et al. 2011; Child et al. 2012). Given that strict protected areas comprise a small and unrepresentative fraction of the African continent, and that even within protected areas wildlife is declining (Western et al. 2009; Craigie et al. 2010), approaches that seek to capture multiple benefits from wildlife conservation on state, private, and communal lands in Africa are indispensable. This principle is especially important when considering the diverse relationships between local communities and wildlife. Communities living with wildlife

are not monolithic entities; rather, they are composed of different groups of people who will experience different costs and benefits from wildlife conservation (Agrawal & Gibson 1999; Roe et al. 2009). For example, wealthy cattle owners and poor subsistence farmers will have different perceptions of wildlife conservation given the particular costs and benefits they are likely to experience. Diversifying benefit streams from wildlife conservation so that the variety of stakeholders within local communities are incentivized to promote or at minimum tolerate living with wildlife will provide the greatest likelihood that conservation as a land use will ultimately prove more attractive than wildlife-unfriendly alternatives. Because communal lands comprise a large fraction of rural Africa (up to 500% more than state-managed forest reserves and national parks [Alden Wily 2011]), management of these lands will play a huge role in determining the success or failure of biodiversity conservation efforts across the continent.

We focused on how different types of benefits provided by wildlife vary over time, space, and community stakeholder groups in communal conservancies in Namibia. Namibia's Community-Based Natural Resource Management (CBNRM) program began in the mid-1990s, when progressive legislation for the devolution of conditional rights to natural resources allowed communities to register areas of customary landholding as "communal conservancies." Registering these conservancies (involving developing zoning and sustainable resource management plans and a constitution) allows local communities to manage and benefit from wildlife and other natural resources on their traditional lands. Prior to the legislation, natural resources were the sole property of the state. Although wildlife has been used by people for millennia in the region that is now Namibia, the last century was characterized by declines in various species, starting with the rinderpest outbreak at the end of the 19th century, followed by overhunting of big game species by colonial hunters, and more recently by a major drought combined with a poaching increase in the 1980s (Owen-Smith 2010). Namibia's CBNRM program is widely recognized as having contributed to a strong recovery of wildlife in large parts of the country, through the creation of social and economic incentives for the sustainable coexistence of wildlife and people on communal lands (Owen-Smith 2010; Naidoo et al. 2011*b*; NACSO 2013). Additionally, the principles used to incentivize communities to steward wildlife across very large spatial scales are already being adopted by numerous other countries in Africa and beyond (NACSO 2013). We examined how changes in benefits over time generated on communal conservancies in Namibia vary according to whether they were derived from tourism or hunting (the 2 most significant benefits derived from wildlife). We also assessed how these benefits flow to different stakeholders within local communities and how factors such as time of establishment and changes in resource management policies affect such benefit flows on communal lands.

Methods

We used data from 77 communal conservancies registered by 2012 in Namibia to examine benefit flows associated with hunting and photographic tourism. The first four of these conservancies were established in 1998, and we used data through the 2013 calendar year for all of them. For both hunting and tourism, conservancies negotiate agreements with private operators. The agreements between conservancies and operators specify the portion of income the conservancy receives (typically 8–12% of total lodge revenue and from 30–75% of trophy price, depending on the species) and jobs to be offered to community members with the operation (from 20–50 for tourism lodges, depending on factors such as size and location, and 8–10 for hunting camps). In addition, community members hunt for subsistence and allow local sales of meat from wildlife through game cropping. Information on fees paid to conservancy management committees; salaries of community members employed in the tourism or hunting industry; and nonfinancial benefits (primarily meat from hunting, but also meals, training, human-wildlife conflict compensation, and other donations to the community at large) is compiled annually by every conservancy. Financial reporting of conservancies is supported by various nongovernmental organizations, is ground-truthed, and is double-checked against analogous reports from tourism and hunting operators.

We used these data and categorized each source of benefit as to whether it was derived from tourism or from hunting. The CBNRM program uses the price of buying alternative meat as the value of wild meat distributed from animals that were hunted (replacement-cost shadow price approach). In 2013, it was 18 Namibian dollars/kg of meat (NACSO 2013). This shadow price can vary and is adjusted from year to year to reflect supply and demand, but the same rate is applied across the country in order to maintain comparability of meat benefits generated in different regions. We used a consumer price index produced by the Bank of Namibia to standardize benefit figures from all years into constant 2013 Namibian dollars. We subsequently expressed all figures in 2013 U.S. dollars (U.S.$) based on the average monthly exchange rate in 2013 of U.S.$1 = N$9.64.

We divided benefits into the 3 classes (described above) because each represented a different type of gain that is channeled to different parts of a conservancy and has different implications for the sustainability of the conservancy and for its livelihood value to members. Income (i.e., fees from lodge and hunting concessions) to management committees is used by conservancies to cover operational and management costs

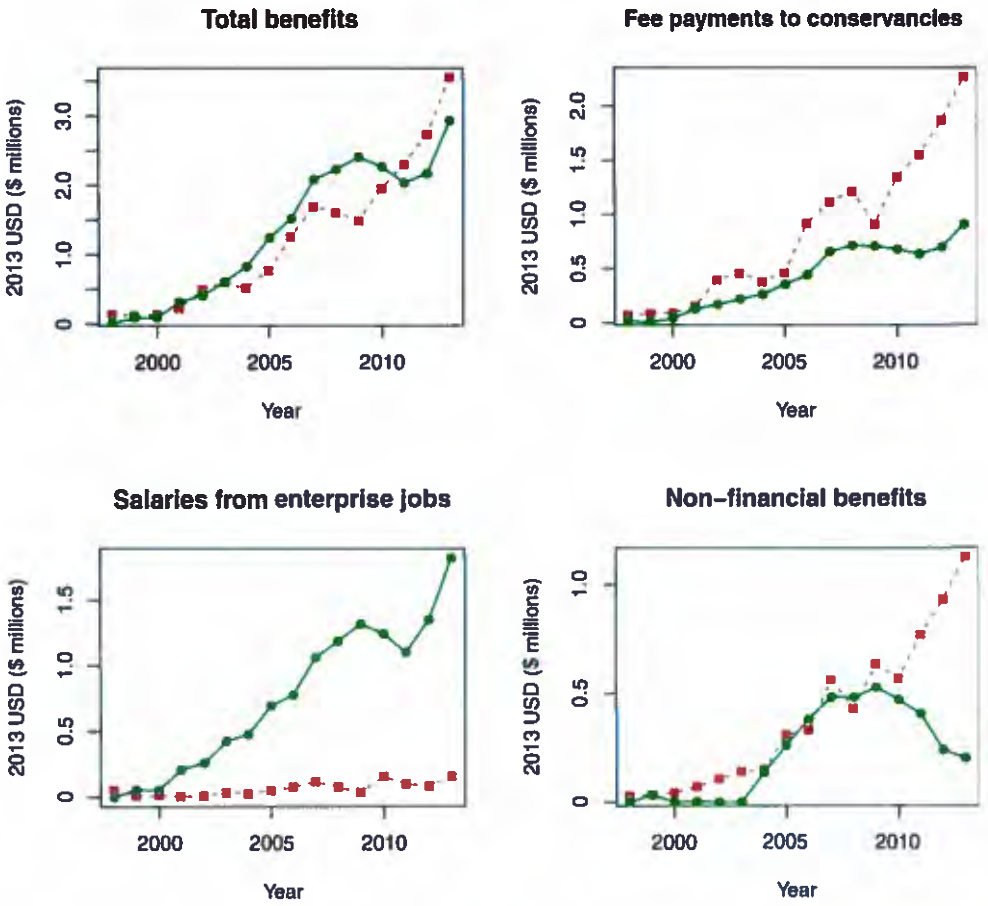

Figure 1. Benefits generated across all conservancies in Namibia's Community-Based Natural Resource Management program, 1998–2013, from hunting (squares) and tourism (circles): (a) total benefits, (b) fee payments to conservancies, (c) salaries from enterprise jobs, and (d) nonfinancial benefits.

(including paying the salaries of community game guards and other conservancy staff members, vehicle fuel costs and maintenance, and office upkeep expenses) and is also distributed as cash and funds for development projects within the community. Individual conservancy members who are salaried employees at tourism lodges or hunting camps clearly benefit financially from conservation, and this linkage should result in strong incentives for promoting wildlife as a land use in their households and among their families and social networks within the community. Conservancy members also benefit individually from the consumption of wild meat that is distributed throughout the community from hunted animals. This benefit, although nonfinancial, is typically viewed as a strong and very direct link between the value of having wildlife on communal lands and the members' livelihoods and well-being (NACSO 2013). To quantify the magnitude of these financial flows from hunting and tourism to stakeholders within communities, we used a subset of conservancy data from 2011 to 2013, during which time detailed financial accounting statements were used to track incoming conservancy revenue.

To simulate how a trophy hunting ban would affect the viability of communal conservancies in Namibia, we used detailed financial statements that were available for a subset of 50 conservancies in 2013 (all but two of the 52 conservancies that generated some level of benefits in 2013) and tabulated the operating costs each conservancy accrued. We then simulated the effects of a ban by removing all cash income that conservancies earned from trophy hunting in 2013 (assuming this cash income could not be substituted by increases in tourism) and calculated the difference in the proportion of conservancies that were able to cover their operating costs based on conservancy income under the status quo versus under a trophy-hunting ban. For comparison's sake, we removed all conservancy income from tourism and assessed how this changed financial viability of conservancies. We also used data on harvested animals and nationally averaged trophy prices to estimate the contribution of individual wildlife species to trophy hunting income.

Finally, for each conservancy we split total benefits over time into 2 series, one for hunting and one for tourism (Supporting Information). We characterized

these financial time series by calculating 4 metrics per conservancy: temporal trend (slope from a linear regression of benefits on year); volatility (root mean square error from the linear regression); end point (magnitude of benefits in 2013); and lag time between year conservancy registered and year the first benefits were generated.

We used *t* tests on these metrics to assess whether temporal flows of benefits to conservancies were significantly different between hunting and tourism.

Results

Of the 77 conservancies established by 2012, 25 reported not generating any benefits from either hunting or tourism. Considering all conservancies in Namibia's CBNRM program, aggregate benefits increased over time (Fig. 1). Total benefits from tourism and hunting were similar in the early years of the program, but tourism benefits exceeded those from hunting from 2003 to 2010, whereas from 2011 to 2013 the benefits from hunting were greater than tourism benefits (Fig. 1a). Although fee payments to conservancies and nonfinancial benefits (primarily meat) from hunting accumulated at higher levels than those from tourism (Figs. 1b and d), total salaries from tourism enterprise jobs increased 10 times faster than salaries from hunting jobs (Fig. 1c). Nonfinancial benefits from tourism dropped sharply from 2011–2013 relative to continued increasing nonfinancial benefits from hunting (Fig. 1d), a result that may have coincided with the worldwide economic downturn in 2008 and fewer available resources for tourism companies to make additional contributions to conservancies.

Conservancies were formed in roughly 4 cohorts that coincided with (1) initial heavy donor investment (1998–2001, 15 conservancies), (2) a period of declining donor investment (2003–2005, 29 conservancies), (3) an upturn in investment peaking in 2009 (2006–2009, 15 conservancies), and (4) a further increased-investment phase (2011–2013, including 18 conservancies registered by the end of 2012). The earliest conservancies, in cohort 1, had similar levels of total benefits for the first 6 years after registration, after which benefits from both hunting and tourism continued to increase but at a faster rate for tourism (Fig. 2a). Conservancies in cohort 2 (Fig. 2b) had roughly similar rates of growth in total benefits from tourism and hunting, whereas cohorts 3 (Fig. 2c) and 4 (Fig. 2d) earned virtually no benefits from tourism and had either moderate (cohort 3) or low (cohort 4) benefits from hunting.

Disaggregating the national-level data revealed that pathways for generating benefits over time varied substantially among conservancies (Supporting Information). Of the 52 conservancies that derived some level of benefits from wildlife, 28 derived all or almost all of their total benefits from hunting, 6 derived all or almost all benefits from tourism, and 18 had substantial levels of benefits from both hunting and tourism.

Although there was a tendency for the total benefits from tourism to be higher than those from hunting, there were no significant differences for any of the conservancy time series metrics (Table 1). The only exception to this was the lag time between conservation formation and the beginning of benefits generation. After their formation, conservancies derived benefits from hunting approximately twice as quickly as they derived benefits from tourism (Table 1). On average, conservancies started generating benefits from hunting about 3 years after their formation, whereas it took 6 years, on average, after conservancy formation to start generating benefits from tourism.

In addition to temporal and spatial differentiation, there were differences in how benefits from tourism and trophy hunting flowed to the different constituencies contained within communal conservancies (Fig. 3). Based on detailed financial accounting data from 2011–2013, 58.3% of the financial benefits from tourism were in the form of jobs to conservancy members at joint-venture lodges, whereas 30.3% of the benefits were lodge contractual fees used for conservancy management and 11.5% were nonfinancial benefits to the community at large less.

In contrast, the majority (64.3%) of the benefits from hunting were in the form of cash for the operation of the conservancy, and a substantial fraction went to the community at large in the form of meat from hunted animals (32.0%, or approximately 1.4 million kg over the 3 years). Conservancies used income from trophy hunting and tourism in a variety of ways that benefited the entire community (Fig. 3), most importantly for the salaries of conservancy employees and for other conservancy operating costs, but also for compensation for wildlife conflict, payments to traditional authority structures, direct cash dividends, community-level projects, and infrastructure development. Our data suggest that operational costs, conservancy employee salaries, and the various benefits to the community at large were mostly derived from hunting because hunting operators paid fees from 2011–2013 of $5.41 million (72% of the total), whereas tourism operators paid $2.13 million (28%).

Currently, many conservancies cover their operating costs with income derived from trophy hunting and from tourism that is directed to conservancy management. Simulation of a trophy hunting ban showed a reduction in the number of conservancies with incomes greater than operating costs in 2013, from 74% (37 of 50) under the status quo to 16% (8 of 50) when conservancy income from hunting was eliminated. If this reduction were to occur throughout the country, it would cover nearly 50,000 km^2 (Fig. 4). When conservancy income from tourism was removed, the effect was again negative but

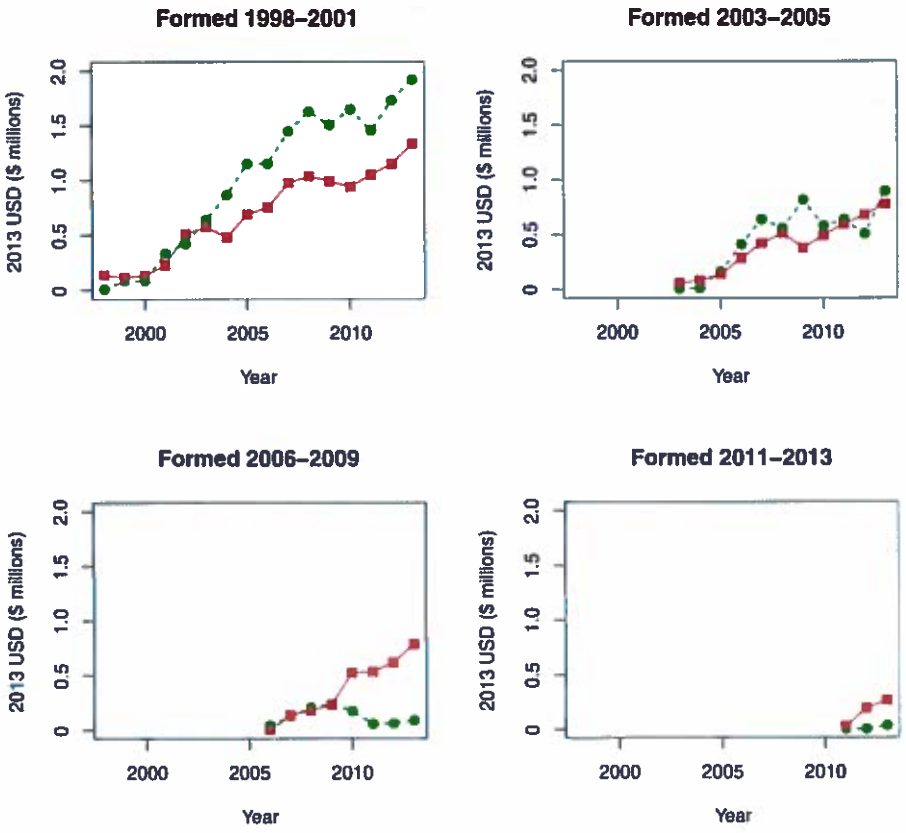

Figure 2. Total benefits from 1998–2013 for hunting (squares) and tourism (circles) across conservancies formed in 4 periods: (a) 1998–2001 (n = 15), (b) 2003–2005 (n = 29), (c) 2006–2009 (n = 15), and (d) 2011–2013 (n = 18).

Table 1. Statistical differences among time series of different metrics of total benefits (in U.S. 2013 dollars) generated from trophy hunting versus tourism on communal conservancies ($n = 52$) in Namibia.*

Variable	*Hunting*	*Tourism*	*t*	*P*
Benefits in 2013 (U.S.$ 2013)	41,453	56,255	−0.91	0.36
Trend (linear regression) of annual change (U.S.$ 2013)	2458	3954	−1.39	0.17
Volatility (root mean square error) of change over time (U.S.$ 2013)	79,192	82,501	−0.16	0.83
Average annual gain (U.S.$ 2013)	8723	11,175	−0.93	0.36
Maximum annual gain (U.S.$ 2013)	47,420	68,694	−1.19	0.23
Lag (years) between conservancy formation and first benefits	2.81	5.71	−3.29	0.001
Number of conservancies specializing in hunting or tourism	28	6	—	—

**Excluding conservancies that had not generated any benefits from either hunting or tourism.*

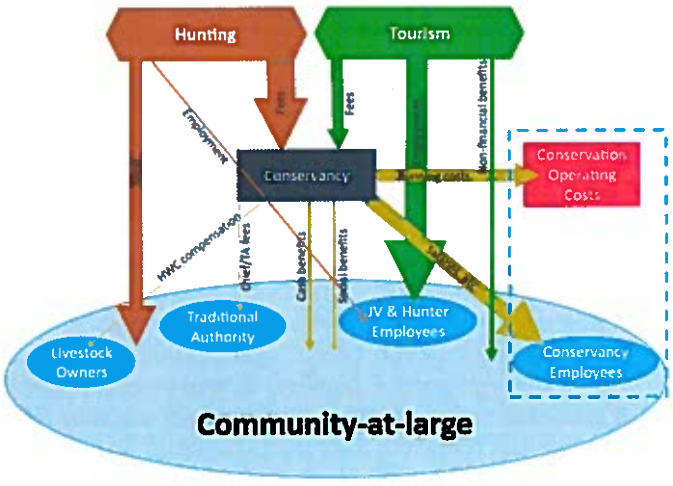

Figure 3. The flow of benefits to various sectors of a stylized local community in Namibia (widths of arrows proportional to dollar values of flows to conservancies from 2011 to 2013; brown, hunting benefit; green, tourism benefit; olive green, flows with a mix of hunting and tourism benefits; dashed rectangle, reinvestment of income into conservation activities; JV, joint venture tourism; HWC, human wildlife conflict; TA, traditional authority). Specific stakeholders (blue ovals) and the overall community at large receive the benefit flows indicated by the arrows ending in those ovals. Income to the conservancy committee (black rectangle) comes from both sectors and is redistributed as indicated, including to cover conservation operating costs (red square).

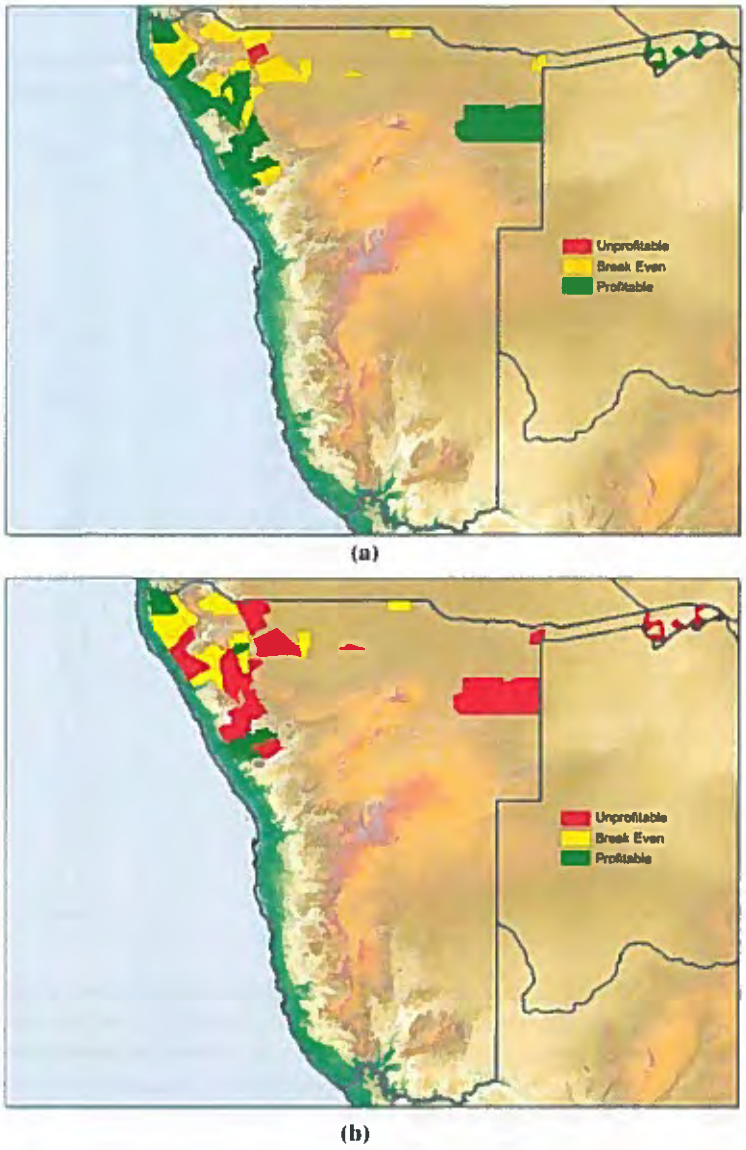

Figure 4. Revenues minus operating costs for 50 communal conservancies for which detailed management cost data were available in 2013 under (a) the status quo and (b) a simulated trophy hunting ban. Break-even conservancies indicate those for which revenues and operating costs are within $5000 of one another.

less marked; 59% of conservancies remained able to cover their operating costs.

Finally, of the 303 animals harvested by trophy hunters in 2013, individuals from 2 of the Big-5 (buffalo [*Syncerus caffer*], elephant [*Loxodonta africana*], lion [*Panthera leo*], leopard [*Panthera pardus*], rhinoceros [*Diceros bicornis* and *Ceratotherium simum*) species hunted in Africa, buffalo and elephant, accounted for 78.3% of hunting revenue; over 55% was attributable just to elephants (Table 2).

Discussion

Despite the importance of both tourism and hunting to conservation, and the debate surrounding their implementation, we are the first study to use detailed quantitative data across multiple jurisdictions and over a lengthy time span to directly compare the financial performance of these two activities. Our data from 77 Namibian conservancies from 1998 to 2013 showed that trophy hunting and tourism reached similar aggregate levels but began to generate benefits at different times (earlier vs. later in a conservancy's life-span) and flowed to different beneficiaries (community management committees and the community at large vs. individual employees). Previous work in Namibia has demonstrated that benefits from hunting and tourism are also spatially differentiated; conservancies are more likely to generate benefits from hunting in areas with diverse wildlife and Big-5 species, whereas the presence of black rhinoceros (*Diceros bicornis*) and broader environmental conditions (distance to tourist routes, topographical diversity, and rainfall) are correlated with higher benefits from tourism (Naidoo et al. 2011*b*). In addition, the first conservancies established were typically those with the highest potential to

Table 2. Number of animals killed by trophy hunters in 2013, by species; average payment made per animal; and the estimated overall contribution of each species to trophy hunting income on communal conservancies in Namibia.

Species	*Animals hunted*	*Payment per animal (2013 U.S.$)*	*Revenue (2013 U.S.$)*	*Percentage of total*
Baboon	17	25.62	435.58	0.03
Black-backed jackal	6	23.65	141.91	0.01
Black-faced impala	8	723.55	5788.38	0.3
Blue wildebeest	12	382.26	4587.14	0.3
Buffalo	71	5497.93	390,352.70	23.4
Burchell's zebra	22	388.69	8550.10	0.5
Bushbuck	1	746.89	746.89	0.04
Common impala	22	180.91	3980.08	0.2
Crocodile	22	1321.06	29,063.28	1.7
Common duiker	5	116.18	580.91	0.03
Elephant	69	13,296.47	917,458.09	54.9
Gemsbok	60	274.79	16,490.46	1
Giraffe	7	677.80	4744.50	0.3
Hartmann's mountain zebra	67	356.54	23,887.76	1.4
Hippopotamus	31	2068.26	64,117.43	3.8
Klipspringer	9	282.88	2546.27	0.2
Kudu	55	449.38	24,718.57	1.5
Red lechwe	13	1190.35	15,474.59	0.9
Leopard	11	2210.79	24,318.88	1.5
Lion	2	11,371.89	22,743.78	1.4
Ostrich	14	102.49	1435.17	0.1
Reedbuck	3	591.29	1773.86	0.1
Roan antelope	9	4385.68	39,470.95	2.4
Sable antelope	9	5290.46	47,614.11	2.8
Spotted hyena	5	297.30	1486.41	0.1
Springbok	89	154.56	13,756.85	0.8
Steenbok	10	89.73	897.61	0.1
Warthog	17	187.03	3179.46	0.2
Waterbuck	1	1037.34	1037.34	0.1
Totals	667	—	1,671,379.05	100

generate benefits from wildlife, and, as with our cohort results, older conservancies generate higher levels of aggregate benefits than younger ones (Naidoo et al. 2011*a*; Humavindu & Stage 2015).

We found that tourism and hunting both made substantial and separate contributions to the economic welfare of rural communal residents; the former was weighted toward employment and wages and the latter toward governance structures and management costs. A focus on either one or the other would lead to substantial reductions in overall benefit generation and incentives for wildlife conservation throughout Namibia. For much of Africa and other parts of the world, Westerners tend to view tourism as the dominant wildlife-based development paradigm for delivering a sustainable flow of benefits to local communities living with wildlife or near protected areas (Kiss 2004; Hawkins & Mann 2007). Similar to the results of studies of private landholders (Lindsey et al. 2013*b*) and national economies (Barnes et al. 2002; Lindsey et al. 2007), our results showed it is important to recognize that the direct benefits of hunting are roughly similar in magnitude to those of tourism for communal conservancies in Namibia.

Beyond this aggregate overall similarity between the benefits of hunting and tourism, there are important differences in scale and sequencing between the two activities. For the typical conservancy, benefits from hunting are generated quickly, within a few years of formation. In these early years of a conservancy, income from trophy hunting is critical for the management of the area, and the meat from hunted animals makes tangible the economic benefits that wildlife conservation can deliver to conservancy members. Benefits from tourism take twice as long to develop, due to the time needed for the recovery of wildlife populations, and the investments in both physical (i.e., lodges and other infrastructure) and human capital required to host high-end tourism in communal areas. Few conservancies (12%) specialized in tourism; most conservancies generating benefits from tourism also generated benefits from hunting. In contrast, over half (54%) of the conservancies generating benefits in Namibia did so from hunting alone, because hunting can be sustained in areas with relatively low densities or visibilities of wildlife, and in landscapes that are unappealing or inaccessible for photographic tourism (Lindsey et al. 2006). Because these conditions characterize much of the African protected- (in the widest sense) area estate, it follows that preventing or discouraging trophy hunting would remove possible incentives for conservation across a large swathe of the continent

where nature-based tourism is not viable (e.g., Blom 2004).

Benefits from trophy hunting and tourism also accrue to different stakeholders within communal conservancies. Benefits from tourism were mainly in the form of employment income to conservancy members who are hired to work at lodges built on conservancy land. Although these employees normally come from among a group of conservancy members nominated by the conservancy, ultimately staff are hired based on their knowledge, communication skills, and potential. Jobs of any kind are extremely rare in remote rural areas and thus highly sought after; therefore, tourism is viewed very favorably by local residents who are employed in the industry (Suich 2010; Silva & Motzer 2015). In contrast, agreements between communities and hunting operators provide significantly higher levels of income for conservancy management, as well as greater nonfinancial benefits (largely from meat) distributed directly to the community at large.

The income to management committees is essential; without it, most communal conservancies in Namibia would be unable to cover their operating costs (which three-quarters of the 50 conservancies we assessed were doing). Conservancies unable to cover their operating costs will likely cease to pursue conservation as a viable land use because without conservancy income, game guards cannot be paid, management and monitoring plans cannot be developed and instituted, the sense of local ownership over natural resources dissipates, and wildlife becomes much more vulnerable to declines from poaching and overharvest. This link between income from hunting and the conditions and incentives that permit wildlife to persist as an economically viable land use is critical but often unrecognized. Our data also show that almost 80% of hunting benefits are delivered by two species (elephant and buffalo); elephants alone generate over 50% of all hunting benefits from an increasing population base (7500 individuals in 1995 to over 20,000 in 2012 [Craig 1999; Ministry of Environment and Tourism 2012]). Therefore, even a targeted hunting ban on elephants or an import ban such as those that currently prevent the import of elephant trophies from Tanzania and Zimbabwe into the United States is likely to have a very negative impact on Namibia's CBNRM program by severely undermining conservancy governance structures and incentives for conservation. Anecdotal accounts of the impact of Botswana's 2014 hunting ban suggests that similar negative consequences (an increase in poaching for meat and trade and increased collaboration of local communities with international poaching gangs) may be occurring there (Somerville 2015).

Although we found there were impressive financial gains from trophy hunting, the sustainability (both ecological and economic) of these operations on communal lands in Namibia is rightly of major concern. As such, it is regulated via annual estimates of species' populations and harvest quotas derived in agreement with local communities and the Ministry of Environment and Tourism (NACSO 2013). Although data from the various conservancy landscapes within the country indicate populations in these areas have generally increased since the advent of Namibia's CBNRM program (Naidoo et al. 2011*b*), evidence on possible negative impacts of trophy hunting on wildlife populations in other parts of Africa (Packer et al. 2010; Lindsey et al. 2013*a*) means that trophy hunting must be carefully monitored in Namibia to ensure the same does not happen. There have been no assessments on how trophy size or quality in particular species may be changing over time, a concern that has been raised for trophy hunting in Africa (Crosmary et al. 2013) and that may result in undesirable genetic changes within hunted populations (Coltman et al. 2003). It is therefore critical that data on the size and quality of trophy exports be analyzed for Namibia's CBNRM program to inform monitoring, evaluation, and management of the trophy-hunting industry. High-profile, apparently illegal hunts such as of lions on the borders of national parks in Zimbabwe, and ethically dubious practices, such as canned hunting of captive animals, also illustrate that the industry itself must play a greater role in addressing issues that throw the sector into disrepute. Finally, growing human populations and a tremendous increase in elephant poaching for the international ivory market may eventually result in reduced quotas of elephants and therefore threaten the financial benefits communal conservancies have generated through trophy hunting.

The sustainability of photographic nature-based tourism in Africa and beyond has also come under scrutiny (Buckley 2004; Newsome et al. 2012). In Namibia relevant issues for ecological sustainability include impacts of intense wildlife viewing on animal behavior, localized environmental implications of the development of tourism infrastructure (lodges, campsites, roads, disposal facilities, etc.) in sensitive arid environments, and climate-change impacts from the carbon emissions of increasing numbers of international visitors. As with trophy hunting, there are few studies, particularly for the first two considerations, that have evaluated the sustainability of tourism initiatives on communal conservancies in Namibia. Furthermore, from a socioeconomic point of view nature-based tourism on communal lands in Namibia has been criticized as having power imbalances or elite capture issues that render communities unable to secure significant shares of the benefits (Hoole 2010; Lapeyre 2011), even though residents of conservancies with high benefit levels are themselves strongly supportive of tourism (Silva & Motzer 2015). Finally, to assess more fully the overall costs and benefits of wildlife conservation on communal lands in Namibia, there is a need for greater investigation of both human-wildlife conflict costs and who bears them, as well as the opportunity

costs of pursuing wildlife conservation as a land use versus alternative uses.

Despite these caveats, our results show that hunting and tourism generated similar aggregate levels of benefits for local communities in Namibia. Because these benefits occur at different times, in different places, and reach different sections of local communities, each are essential to the successful functioning of community-based natural resource management in Namibia. As with other contexts (Sandbrook & Adams 2012), recognizing that benefits from conservation to local communities take various pathways has important implications for conservation and the development of effective incentives. Further investigation is therefore desperately needed to examine the relative impacts of hunting and tourism in many others areas of conservation importance in sub-Saharan Africa.

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Supporting Information

The total benefits over time from hunting and tourism for each of Namibia's 52 communal conservancies formed by 2012 that have generated some level of benefits (Appendix S1) is available online. The authors are solely responsible for the content and functionality of these materials. Queries (other than absence of the material) should be directed to the corresponding author.

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Short communication

Local perceptions of trophy hunting on communal lands in Namibia

Hilma N. Angula[a,*], Greg Stuart-Hill[a], David Ward[a], Greenwell Matongo[a], Richard W. Diggle[a], Robin Naidoo[b]

[a] WWF in Namibia, P.O. Box 9681, Windhoek, Namibia
[b] WWF-US, 1250 24th Street NW, Washington, DC 20037, USA

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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

* Corresponding author at: WWF in Namibia, 19 Lossen Street, Windhoek, Namibia.
E-mail address: hna20@cam.ac.uk (H.N. Angula).

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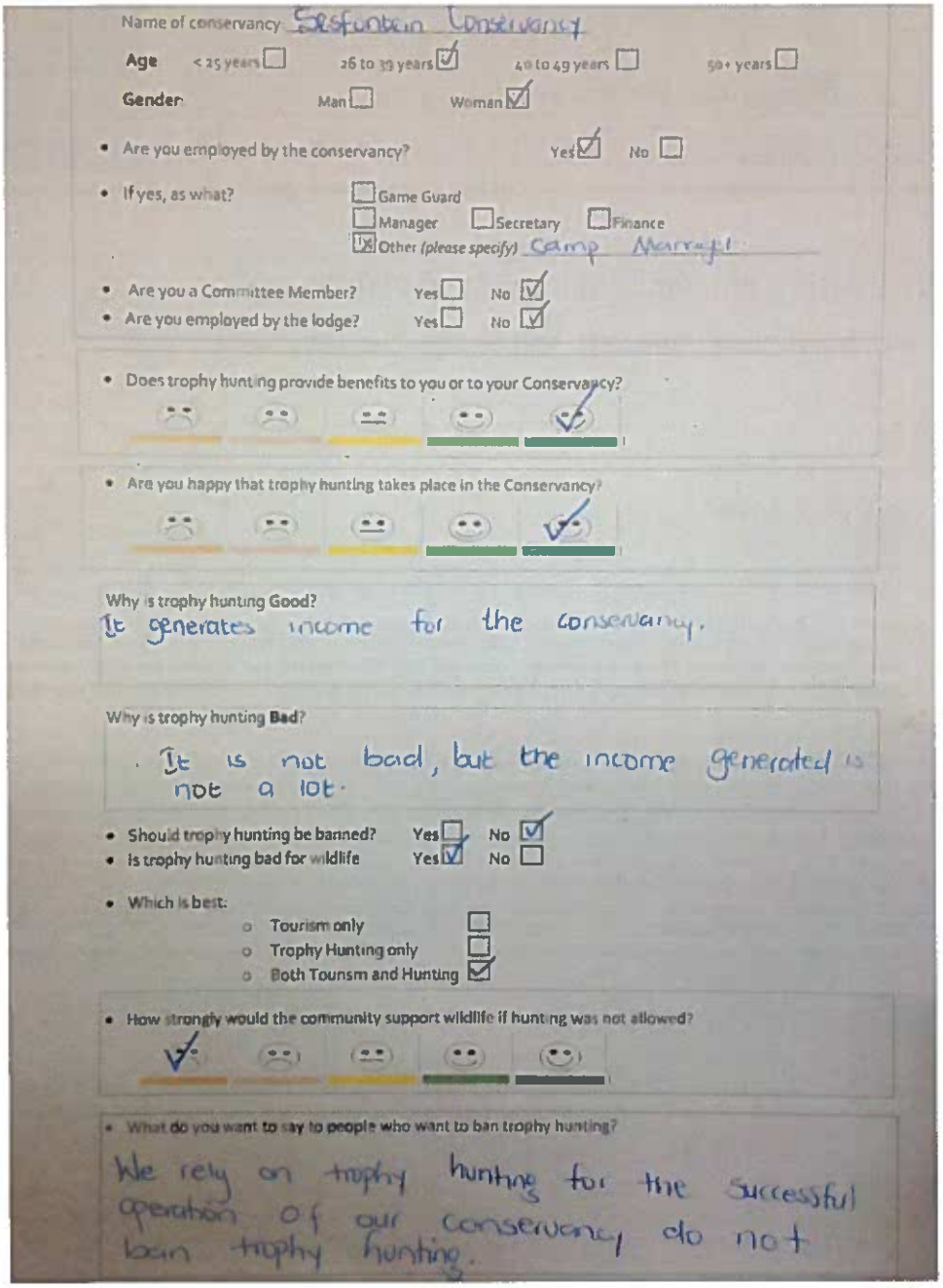
Name of conservancy: Salambala Conservancy

Age: < 25 years ☐ 26 to 39 years ☑ 40 to 49 years ☐ 50+ 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 Tounsm 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 prices), 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 - "age 26_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 "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.

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"

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

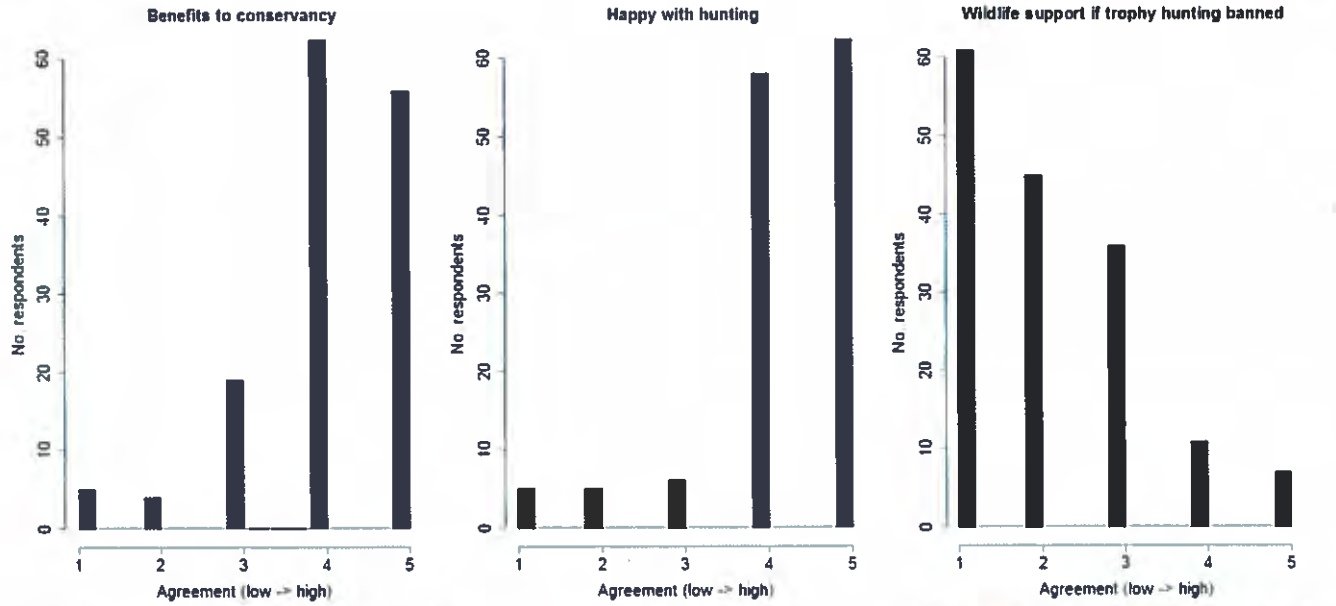

Fig. 2. Histogram of responses to the questions "Does trophy hunting provide benefits to you or to your conservancy?" (left panel), "Are you happy that trophy hunting takes place in a conservancy?" (middle panel), and "How strongly would the community support wildlife if hunting was not allowed?") (right panel).

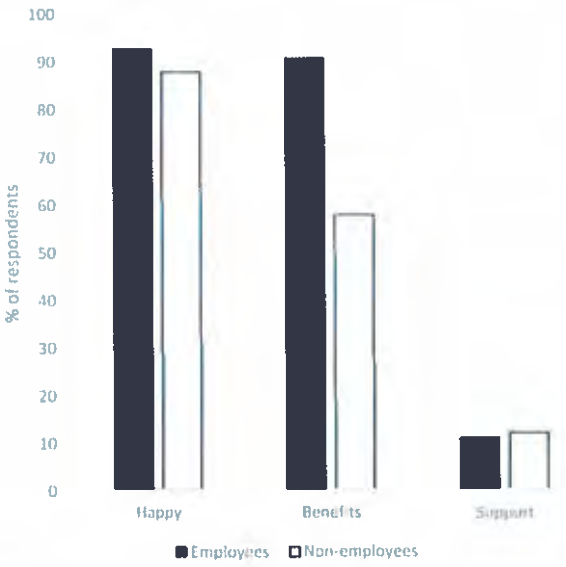

Fig. 3. Employed versus non-employed responses to the questions "Are you happy that trophy hunting takes place in a conservancy", "Does trophy hunting provide benefits to you or to your conservancy?" and "How strongly would the community support wildlife if hunting was not allowed?".

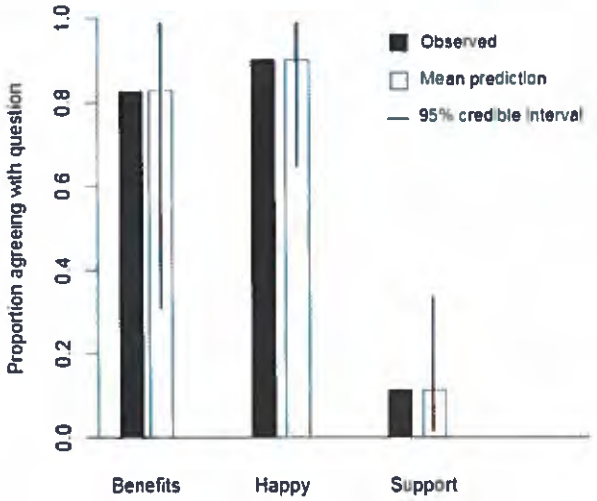

Fig. 4. Actual versus model-predicted proportions of respondents agreeing with the questions "Does trophy hunting provide benefits to you or to your conservancy?" ('Benefits'), "Are you happy that trophy hunting takes place in a conservancy?" ('Happy'), and "How strongly would the community support wildlife if hunting was not allowed?" ('Support').

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 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

19 Lossen Street
PO Box 98353
Windhoek
Namibia

Tel: +264 61 230888
Fax: +264 61 237036

officemanager@nacso.org.na

Share / Save

N#a-Jaqna Conservancy

Named after the Buffalo Thorn Tree

Quick facts

Registered:	July 2003
Region:	Otjozondjupa
Area:	9,120 km²
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...

Website by JARO Consultancy

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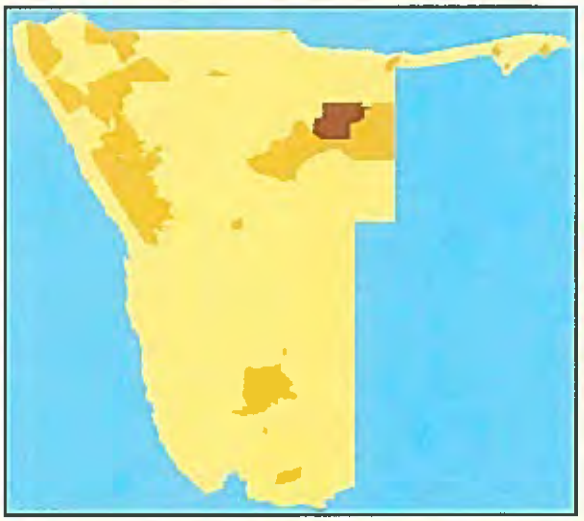
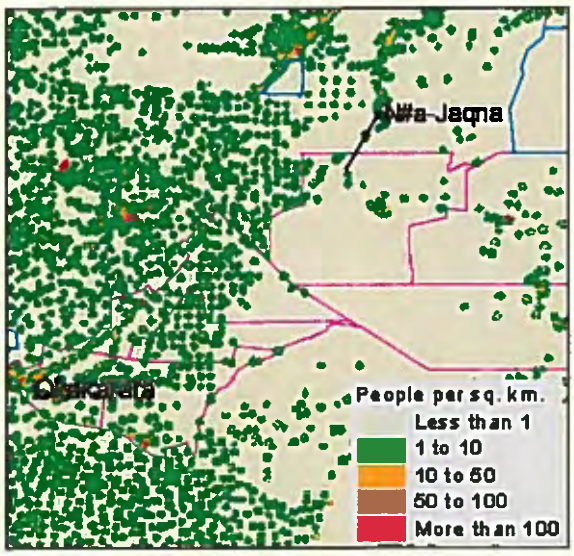
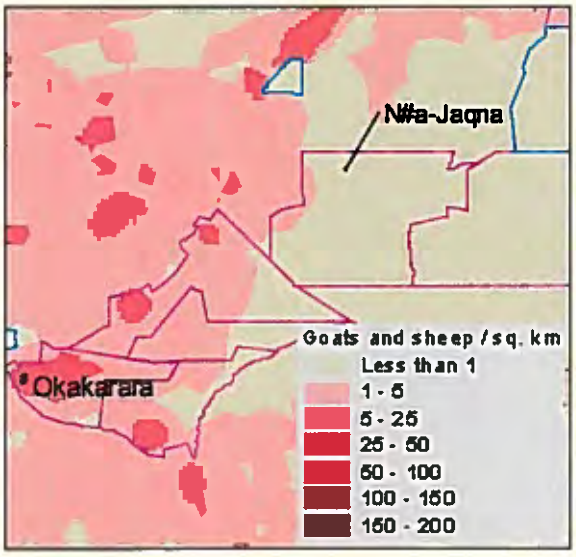
N#a-Jaqna

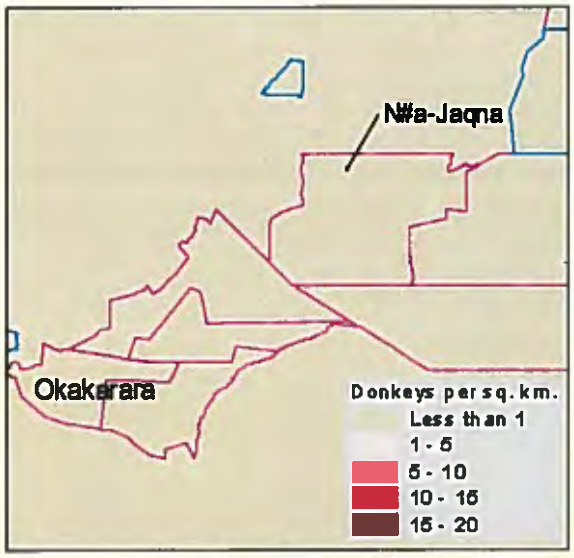
Name:	N#a-Jaqna
Registered:	July 2003
Size:	9120 km^2
Region:	Otjozondjupa
Members:	782
Annual rainfall:	400 – 500 mm
Landscape:	Kalahari Sandveld.
Biome:	Savanna.
Vegetation type:	Northern Kalahari.
Key wildlife species:	Elephant, eland, kudu, oryx, leopard.
Terrestrial diversity:	Moderately low to average.
Terrestrial endemism:	Very low.

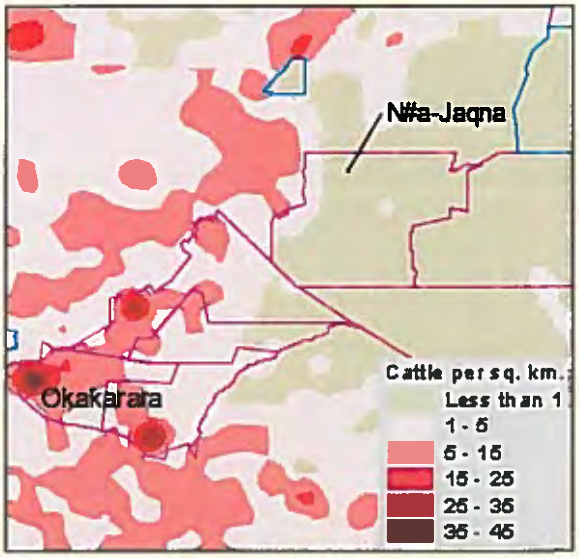


Non-wildlife poulation densities in and around N#a-Jaqna conservancy.
State protected areas are outlined in blue, conservancies in purple.









2016 Annual Conservancy Audit Report

N≠a Jaqna

Status Summary & Natural Resource Report

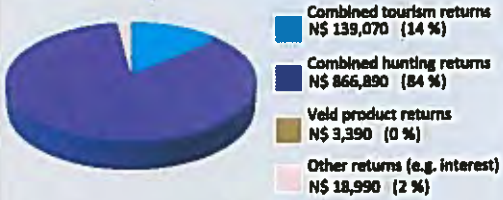
maximising wildlife returns by minimising threats...

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$ 9,620
Total conflict cost estimate	**N$ 12,950**

Natural resource cost–return ratio in 2016

the chart shows the approximate ratio of returns to costs

Natural resource returns outweigh approximate conflict costs

Total returns N$ 1,028,340

Approximate conflict costs N$ 12,950

Approximate positive ratio 79 : 1

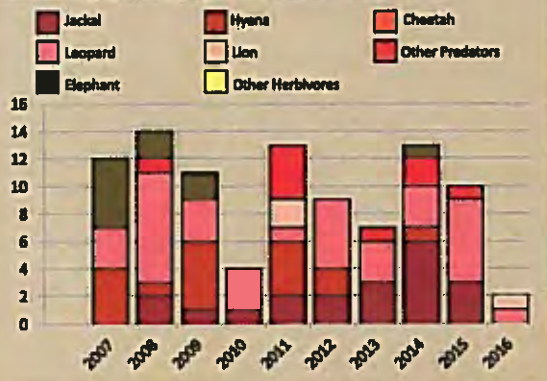
Management performance in 2016

Category	Performance
1 Adequate staffing	
2 Adequate expenditure	
3 Audit attendance	
4 NR management plan	
5 Zonation	
6 Leadership	
7 Display of material	
8 Event Book modules	
9 Event Book quality	
10 Compliance	
11 Game census	
12 Reporting & adaptive 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

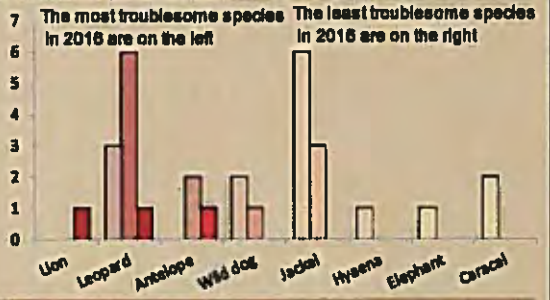
Human wildlife conflict trend

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



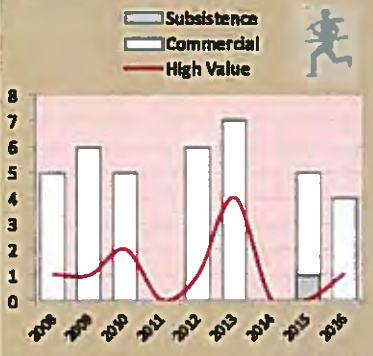
Type of damage by problem animals 2014-2016

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

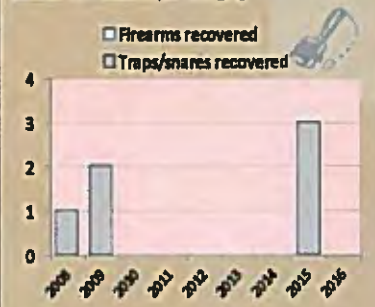
Number of incidents per year

Commercial poaching is a serious threat to conservancy benefits. The chart shows the number of incidents per category



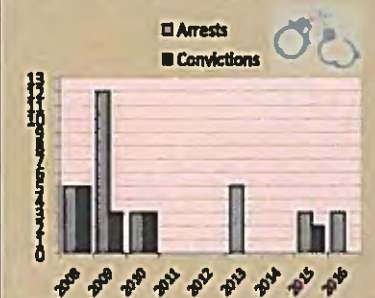
Traps and firearms recovered

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	Own Use & Premium	Shoot & Sell	Capture & Sale	Problem Animal	Total Use		
Duiker	10	4	6							1,200	140
Eland*	5	1	4							5,800	38,500
Elephant*	3	2	1	2	1				3	172,500	90,000
Gemsbok	6	1	5	1	2				3	2,900	2,160
Giraffe	1		1								11,200
Hyaena	3	3								6,600	
Jackal	5	5								600	
Kudu*	5		5								24,250
Leopard	3	3		3					3	12,300	
Lion											
Steenbok	24	3	21							1,100	120
Warthog	3		3								400
Blue											

N≠a Jaqna

Natural Resource Report ...continued...

Not all data or species are shown on this report; use your Event Book for more information

monitoring numbers and trends for a healthy conservancy...

Current wildlife numbers and status

Species	Animals Seen 2016	Estimated population range	Wildlife Status		
			Count Trend	National Guideline	Desired Status
Duiker					
Elephant					
Gemsbok					
Giraffe					
Jackal					
Klipspringer					
Kudu					
Mn. zebra					
Ostrich					
Springbok					

Wildlife Status

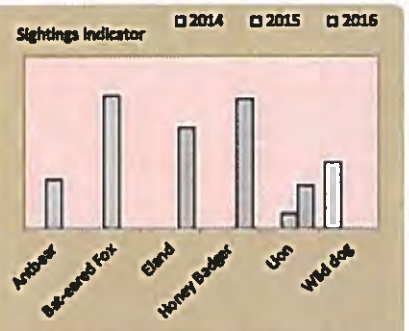
Count trend – gives the species status in the conservancy based on game count trend data.

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.

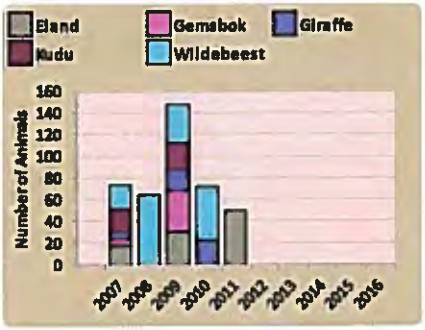
dark green (abundant) – there should be less;
light green (common) – the desired number is reached;
yellow (uncommon) – there should be more;
light orange (rare) – there should be more than double;
dark orange (very rare) – there should be more than triple;
red (extinct) – the species needs to be reintroduced.

Locally rare species

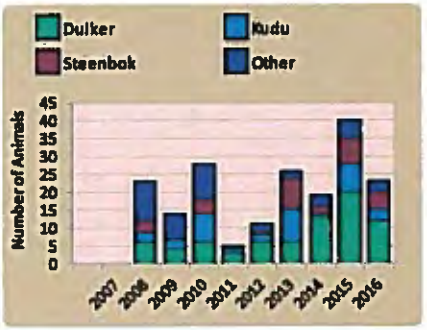


Locally rare and endangered species are not found very often in the conservancy and need special conservation attention.

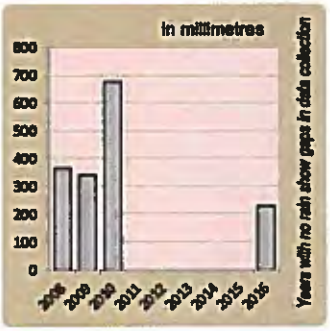
Wildlife introductions



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

Constitutional adherence

Approved constitution	✓
AGM held	✓
Management and utilisation plan	✗
Financial annual report approved at AGM	✓
Financial report external review	✓
Benefit distribution plan	✓

Conservancy Governance

Number of management committee members:	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?	✗

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				

MacDonald, Tim <tim_macdonald@fws.gov>

Trophy Application

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Mon, Sep 30, 2019 at 3:03 PM
To: cf@conservationforce.org, permits@conservationforce.com

Regina,

You had sent me several elephant trophy permits to withdraw. I do not have notes on this application, please let me know what to do next.

U.S. Fish and Wildlife Service Prt # 95530C

On **06/19/2018** an applica on for the importa on of an African Elephant, sport hunted trophy was received by this office **Prt # 95530C**. At the me of the applica on's submission the hunt was to be held at a future date.

Please confirm at this me if you successfully hunted the elephant. If **yes**, please state so, and provide the date and loca on the elephant was taken.

If **no**, do wish to withdraw your applica on at this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific loca on, and date. Permit applica ons and fees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applica on.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

[EXTERNAL] Supplement for Amy Dement Import Permit application # 95530C - Elephant, Namibia

Aimee Korver <permits@conservationforce.org>

Tue 6/23/2020 3:36 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (23 MB)

AmyDementSupplement.pdf; OperatorEnhancereportN#aJagna.pdf;

Ms. Brisendine,

Please, see the attached supplement to the existing application # 95530C for Mrs. Amy Dement.

Attached you will also find her permits for the hunt, the Operator Enhancement report, and the National Elephant Management plan for Namibia that we ask you add to her application. I have had to split this into two e-mails as the attachments are quite large. Please let me know that you have received everything.

Let me know if you have any questions regarding this matter.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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June 23, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Chief Mary Cogliano, Ph.D.
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

RE: PRT # 95530C Amy Dement –
Supplement to Import Permit Application for Sport Hunted Elephant Trophy from Namibia

Dear Chief Cogliano:

This is a supplement to our existing application, PRT # 95530C for an Elephant Trophy Import from Namibia for applicant Amy Dement.

Ms. Dement had a successful hunt and obtained an Elephant bull. It was taken near Nohma Village in the N#a Jagna Conservancy Concession block in the Bushmanland of Namibia. The date the elephant was taken was July 6th, 2018.
GPS Coordinates –
S 10* 15' 27,3"
E 020* 15' 44,1"

We have also provided the Operator Enhancement Report from Thormahlen and Cochran Safaris for the N#a Jagna Conservancy and the Elephant Management Plan for Namibia to be included as enhancement documents for this application.

These documents show that the hunting is well-managed and regulated on lawful sport hunted trophies in Namibia. Over and above, this operator is setting an exemplary standard for their community investments by donating school supplies, drilling and maintaining boreholes to establish permanent Wildlife Water Points, employing local community members, giving away all of the trophy and non-trophy game meat to the residents of community, and maintaining an anti-poaching program with their own funds. Please consider these attached documents and the ones previously provided along with the supplemental information regarding the hunt above, in making a positive enhancement finding for this elephant permit application.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mrs. Amy Dement w/attachments

3240 S I-10 Service Road W, Suite 200 • Metairie, Louisiana 70001 • USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

Enclosures:

a. Operator Enhancement Report- Thormahlen and Cochran
b. Elephant Management Plan for Namibia

1. Name of area operator: Peter Thormahlen
   a. Years in business: 18
   b. Name of company conducting hunt: Thormahlen & Cochran Safaris
   2. Name of concession: **N#a Jagna Conservancy** Size in km^2: 9,120 or 900,120 ha
   a. Land tenure: __ Government lease _X_ Community __ Private ranch __ Private conservancy
   b. Length of concession agreement: 2016-2024 Can it be renewed? _X_ Yes __ No
   c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:

CONTRACTUAL OBLIGATIONS

- ANNUAL REPORTING -The Trophy Hunting Operator must submit an Annual Report Yearly within 30 days after the hunting season ends, which is 30 November. These Annual Reports are handed in at the Ministry of Environment & Tourism, as well as a copy at the Conservancy office, and the WWF office. Failure to submit the report timeously is punishable with a fine of N$5,000.

- MEAT DISTRIBUTION – All hunted Trophy, as well as Non-Trophy game meat is distributed to villages in the concession within 24 hours after being hunted. As a company Policy we do not leave any remains of elephant where it was hunted - no bones, skin, meat etc. After 2 days diesel is poured onto the stomach content and blood at the slaughtering site, wood stacked on top and burned. This is done to cause as little as possible stress on the elephants as there is no smell left of the hunted elephant or its remains. Elephant gets stressed seriously when bones and skin is left at the site!

VOLUNTARY DEVELOPMENTS /INVESTMENTS

- COMMUNITY INVESTMENT – We donate school stationary supplies for the local school through the SCI Blue Bag system in the amount of **N$54,000** per annum, buy uniforms for community game scouts and community camp staff to the value of **N$84,500**.
  We donate the trophy hunting camp which was built at a cost of **N$994,280** after a three-year period, back to the community and lease it from them so they can generate a monthly income from the trophy hunting camp. All maintenance is done by the Trophy Hunting Operator. The trophy hunting camp consist of 4 x client tents, dining area, kitchen tent, and 5 staff tents to the community.

The Daily Rent paid to the community in the Trophy Hunting Camp is **N$350** per person per day visiting.

- WILDLIFE WATER POINT DEVELOPMENT - Drilling and maintaining of the boreholes in the concession to establish Permanent Wildlife Water Points is a crucial part of the concession development as water allows the elephants to become resident in the concession compared to the previous yearly migration into the concession when the natural pans fill up with water during the rainy season. After which the elephants move back into Khadoum National Park and Nyae Nyae Conservancy where there is Permanent Wildlife Water Points.

  Currently 4 PWWP's (Permanent Wildlife Water Point's) have been established at a cost of **N$905,131** in the N#a Jaqna Concession Block.

  Installation of solar pump for water supply to the community members is also a crucial part of the community development program. Community members feel they are rewarded by the Conservation Developments when they receive fresh clean drinking water at their villages. This results in Wildlife Water Points being left alone and not damaged or settled around them, which chases the game away. **Attachment 1 – Wildlife Water Point Development Schedule**

- COMMUNITY EMPLOYMENT - We permanently employ 5 Community Members as Camp Staff, and 10-20 community members as Casual labor in the concession. The Casual Workers are employed 10 months per year to open roads in the concession, open the concession boundaries (Cutlines), and to skin elephants when hunted. The Permanent Staff gets a basic salary of N$2,000 per month which totals to **N$120,000** per annum.
  The Casual workers get a monthly salary of N$1,350 per month. On average **N$180,000** salary is paid per annum to Casual Workers who are community members, which is a great inflow of funds in the poor community.

- ANTI POACHING PROGRAM – Establishment of Wildlife Water Points is the first and most crucial development in the concession so that existing game becomes resident in the concession! After Permanent Wildlife Water Points (PWWP's) are established we start our Anti-Poaching program to protect the PWWP Equipment as well as the existing game. Currently all personnel are utilized as anti-poaching staff when no safaris take place. Community Game Scouts are on permanent anti-poaching patrols. Equipment and funding remain the biggest challenges as equipment is expensive.

  A serious Anti-Poaching program is needed. Funding major constraint, as Operator is spending every possible cent in the development of Wildlife Water Points. The idea is to establish the wildlife water points first so that there is permanent water in the concession, then start with an intensive Anti-poaching program. Mobility is a serious constraint in the anti-poaching effort as the area is

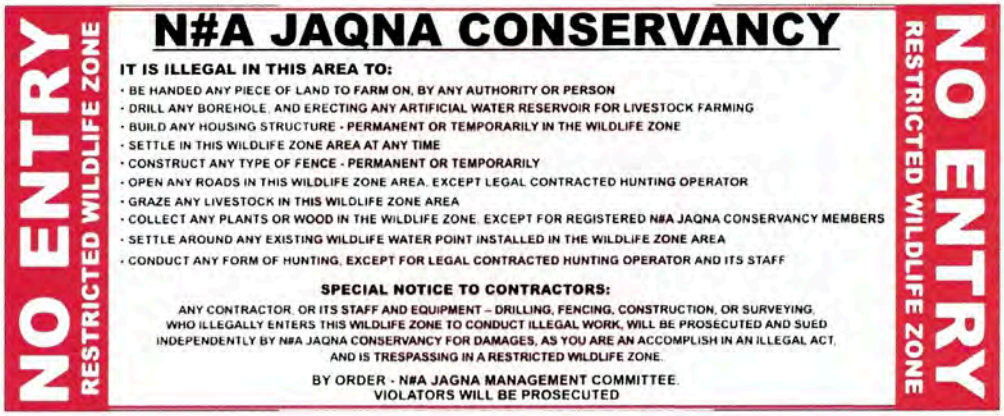
2,25 million acres big. In order to cover the concession properly four-wheeler quad bikes are needed, as well as several anti-poaching bases especially on the northern, and southern borders of the concession area, and radio communication equipment.

Now funding is done from Operators personal funds, and some small donations by hunters. We applied for a Grant from the DSCF (Dallas Safari Club Foundation) and will hopefully receive much needed funds to run a proper anti-poaching and PWWP establishment program. However, our Guides move around a lot in the area, visiting villages, and water holes to discourage poaching. With very positive results as much more game is visible since we got the concession in 2016, because of a higher visibility in the concession, hence less poaching.

However Solar Panels have been stolen by poachers on horseback on our southern border. Which means they come in from our neighboring Ondjou Conservancy as the San people are nomads without horses and livestock. To prevent any further theft, we installed trail cameras powered by a solar panel, and put up 12 feet high on a steel post with barbed wire around the pole preventing thieves to climb up the pole to destroy the cameras. It is small communities, so it will be easy to catch the perpetrator once we have their photos taken!

This area could be a dream concession if funding is available to drill for more water holes, open roads to be able to run an intensive anti-poaching program, and re-introduce game species shot out by the previous SA Army, neighboring and local poachers, i.e. red hartebeest, springbuck, Burchell's zebra, roan, sable, blue wildebeest, and warthog occurred in herds of thousands with none left today.

- NO ENTRY SIGNS



SIGN PERMISSION LETTER

Thormahlen & Cochran Safaris asked for permission to put up NO ENTRY signs at strategic positions to stop illegal land grabbing, and illegal drilling in the concession.

Approval was given by the N#a Jaqna Conservancy Management Committee and the first phase of the signs project is nearly completed. The first phase will be completed in 2019, and the secondary phase will be completed partly in 2019, and finally in 2020 due to the excessive logistics to put the signs up over the whole concession, the and the huge cost of the signs

December 5, 2017

The Chairperson
Me. Sarah Sungu
Conservancy Management Committee
N#a Jagna Conservancy
Mangetti Dune

Dear Sir/Madam

RE: LETTER-CHANGE OF CURRENT "NO ENTRY" SIGNS WORDING

We refer to the meeting held between N#a Jagna Management Committee and Trophy Hunting Operator Thormahlen & Cochran Safaris Namibia Pty Ltd on 1 December, 2017 at the N#a Jagna Conservancy Office at Mangetti Dune.

During our meeting the current NO ENTRY Signs placed at Border Cutlines entry points between Nohma and Nyae Nyae conservancy, were discussed. The Nyae Nyae conservancy as well as the Nohma San Community raised their concern regarding the NO ENTRY signs as they felt that the purpose was to keep San people from these two communities out of the N#a Jagna conservancy.

Thormahlen & Cochran explained in detail that the signs were placed to safeguard the conservancy Wildlife Areas land from the possibility of people from outside the San community illegally entering and building houses, or fencing the Wildlife areas due to the new roads and borders being opened. The N#a Jagna Management Committee

The N#a Jagna management Committee agreed with the Trophy Hunting Operator that this is a big threat considering the illegal land grabbing going on in the Conservancy. It was agreed that additional information will b added onto the existing NO ENTRY signs so that the San communities can feel free to move into and out of the areas.

N#a Jagna Conservancy Management Committee undertook to meet and decide on the additional information's wording, and that the Management Committee will inform Thormahlen & Cochran Safaris Namibia accordingly so that the correct sign information can be added by the Trophy Hunting Operator.

Thormahlen & Cochran Safaris will pay for the additional information needed to be added to the current NO ENTRY Signs, as well as the installation thereof.

We trust that our request will be looked at favorably for both the N#a Jagna Conservancy community, as well as the Trophy Hunting Operator of N#a Jagna Conservancy.

Thank you

Peter Thormahlen
CEO-Thormählen & Cochran Safaris Namibia Pty Ltd

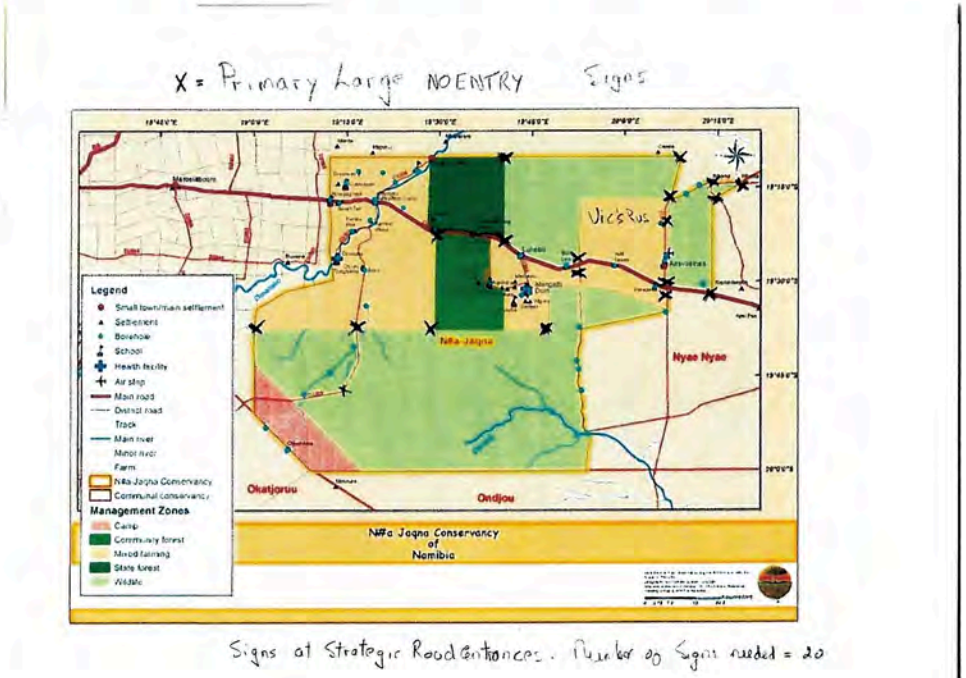
PRIMARY SIGNS

In order to stop the illegal settling and land grabbing of land in the Wildlife Zones of the N#a Jaqna Conservancy, Thormahlen & Cochran Safaris designed NO ENTRY signs with the written permission of the N#a Jaqna Management Committee.

Twenty Primary (Large) Signs will be put up at Strategic points - strategic roads and ploints where illegal land grabbers enter the Wildlife Zones to drop off workers, material, and equipment. It is especially important to have these signs visible so that Drilling Contractors can see them when illegally entering the Wildlife Zones, to illegally drill boreholes for illegal settlers.

A Special Notice on the sign refers to **Drilling Contractors** Illegally entering, and drilling in the Wildlife Zone.

"Ignorance is not an excuse to break the law", according to our Laws in Namibia.



Signs at Strategic Road Entrances. Number of Signs needed = 20

Thus, by putting the signs at strategic entrances to the Wildlife Zone Areas, there is no excuse for a contractor of any kind, to enter a Wildlife Zone. When the signs are put up, a newspaper is used to establish the date when the sign was erected. No excuse as to when the illegal settlers entered the Wildlife Zone.

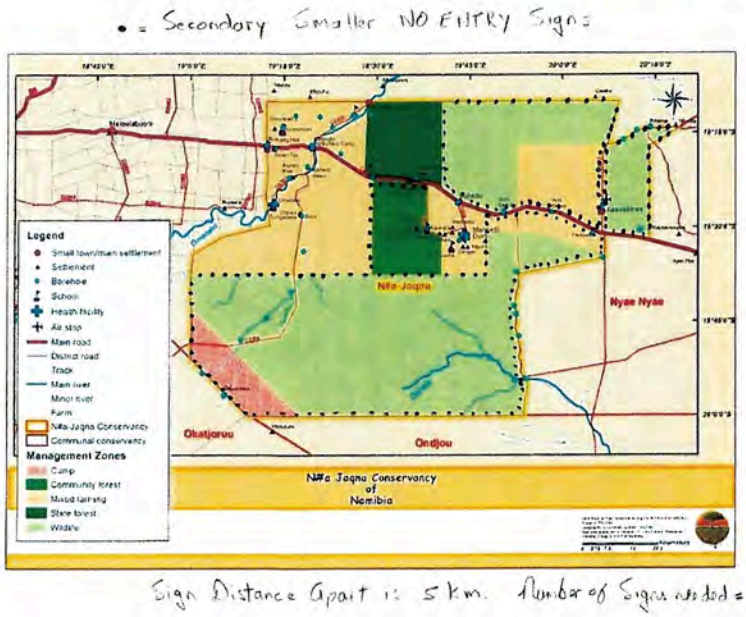
Thormahlen & Cochran Safaris is consulting with Lawyers in Windhoek in order to send a Legal Notice per registered mail, to all Drilling Contractors in Namibia, indicating the Wildlife Zone Areas in N#a Jaqna.

In the event any Drilling Contractor enters a Wildlife Zone to drill, we will get a Court Order against them to prohibit them from drilling boreholes in the Wildlife Zones, as they are obstructing our Contractual Obligation to develop the Wildlife Zones for Game.

It will be much easier, more efficient, and achieve better results, to go after the core of the illegal settling – the Drilling Contractors – than try and evict illegal land grabbers!

SECONDARY SIGNS

In order to have signs visible along all roads and borders of the N#a Jaqna Wildlife Zones, Thormahlen & Cochran Safaris will also erect smaller (Secondary) NO ENTRY signs Five Kilometres apart. Around 150 signs & frames will be needed for this exercise.



Without water no illegal settling can take place, as no one can farm without water for human and livestock!!

Drastic and outside the box measures, and funding, are needed to stop the illegal settling in the N#a Jaqna Conservancy Wildlife Zone.

COST OF CURRENT NO ENTRY SIGNS - 2018

- Invoice 10 x Primary Signs – N$9,890
- Invoice 26 x Secondary Signs – N$11,143.50
- Cost of Steel for 36 x Frames @ N$955 ea – N$35,820
- Welding Rods @ 5 kg -N$600
- Petrol for Generator to weld @ 200 litre – N$3,200
- Labour to manufacture Frames x 6 days x 2 staff @ N$75 ea pd – N$900
- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$3,000
- Cement x 10 bags @ N$100 – N$1,000
- Staff Labour to put up signs x 5 days x 2 staff @ N$75 pd ea – N$750
- Guide C Joubert Labour to put up signs x 5 days @ N$500 pd -N$2,500
- Vehicle to put up signs x 1,500 km @ N$6 per km -N$9,000

TOTAL COST TO PUT UP CURRENT SIGNS – N$77,803

PROJECTED COST OF FUTURE NO ENTRY SIGNS

- Invoice 10 x Primary Signs – N$9,890
- Invoice 130 x Secondary Signs – N$55,717.5
- Cost of Steel for 130 x Frames @ N$955 ea – N$129,350
- Welding Rods @ 25 kg -N$3,000
- Petrol for Generator to weld @ 1,000 litre – N$16,000
- Labour to manufacture Frames x 21 days x 2 staff @ N$75 ea pd – N$3,150
- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$10,500
- Cement x 50 bags @ N$100 – N$5,000
- Staff Labour to put up signs x 25 days x 2 staff @ N$75 pd ea – N$3,750
- Guide C Joubert Labour to put up signs x 25 days @ N$500 pd -N$12,500
- Vehicle to put up signs x 2,500 km @ N$6 per km -N$15,000

TOTAL PROJECTED COST TO PUT UP FUTURE SIGNS – N$263,857.50

- CAMP DINING AREA REPERATION COST

COST CALCULATIONS

- Vehicle Cost -N$6,480
- Thatching Grass – N$25,000
- Trailer Rental Cost – N$6,800

- Thatching Cost – N$3,000
- Thatcher Salary -N$4,500
- Casual Workers' Salaries -N$22,500
- PH Salary -N$15,000

TOTAL REPERATION COST – N$83,280

- N#A JAQNA AIRSTRIP REHABILITATION

Thormahlen & Cochran Safaris strive to develop the N#a Jaqna conservancy as much as possible. The N#a Jaqna Airstrip at Mangetti Dune was built by the South African Military during the Bush War period in Namibia. The airstrip is a huge asset, just being neglected, and is worth millions of Namibian Dollars if it had to be built today.

Instead of using the Tsumkwe Airstrip in Nyae Naye Conservancy, we opted to rehabilitate the Mangetti Dune airstrip. The Cost to rehabilitate the Airstrip is huge, but is worth it for us, as we feel that we must fly our clients into the concession where they hunt. The location of the Airstrip close to Mangetti Dune enables us to let clients see and experience the Mangetti Dune community.

We finished clearing the Airstrip, removed all trees and obstacles that gathered over the last 28 years since the end of the war.

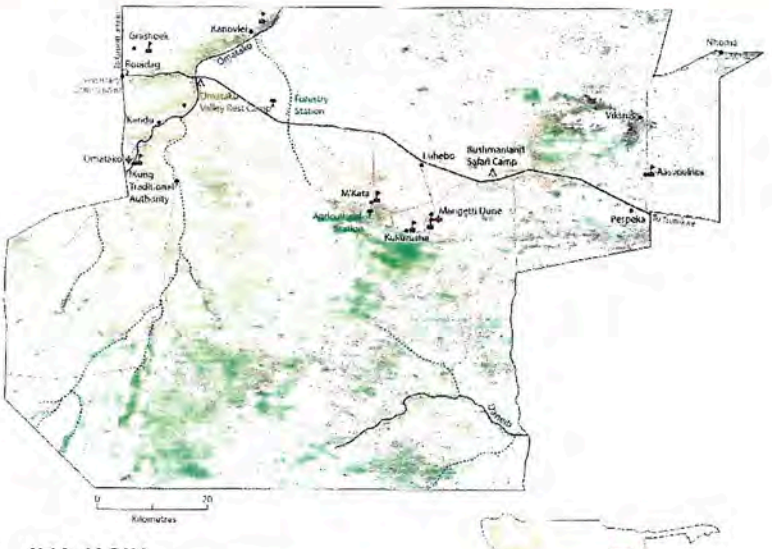
AIRSTRIP REHABILITATION COST-2018

- Casual Labor Cost – N$54,000
- Grader Cost – N$6,000
- Vehicle Cost -N$40,000
- Big Game PH Salary Cost – N$50,000
- Steel Wire to fence off Airstrip for Airplane Safety – N$33,000
- Anchor Poles – N$12,000
- Dropper Poles – N$21,700
- Trailer Rental -N$8,500
- Steel Gate – N$1,000
- Windsock -N$3,500
- Windsock steel post -N$1,000
- Cement -N$2,000
- Molopo Tree Poison – N$3,600

TOTAL AIRSTRIP COST – N$236,300

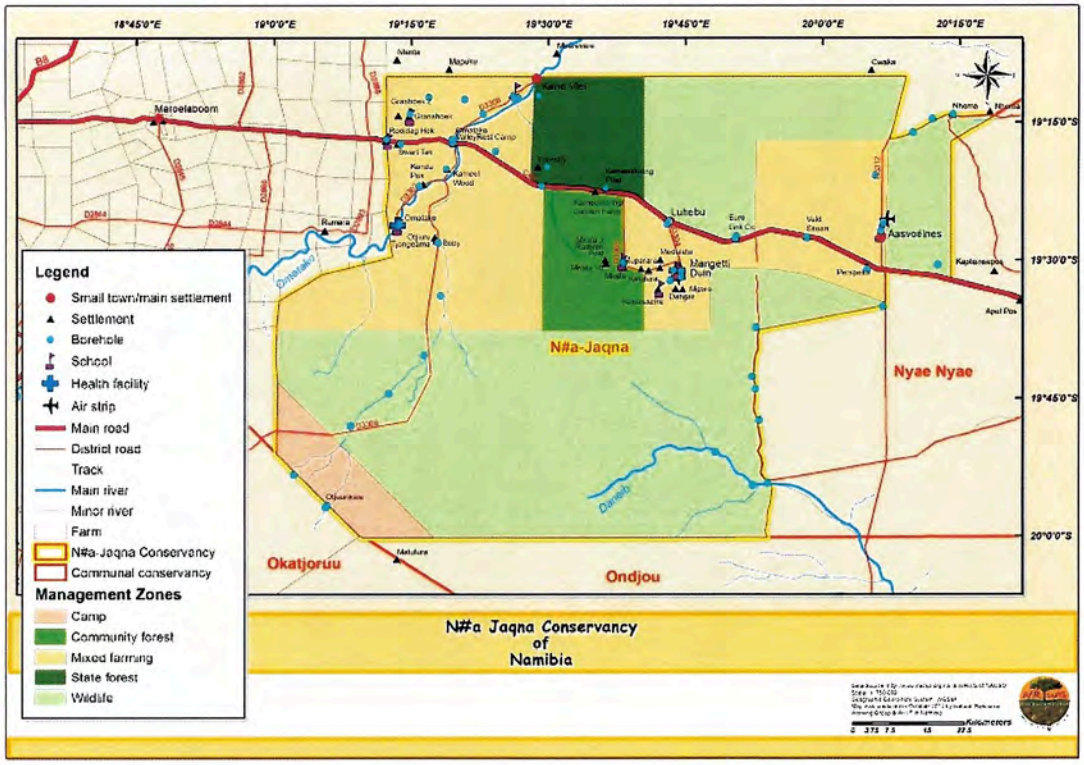
d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:

Concession Location: Located in the Bushmanland of Namibia.
South of the Kavango Region boundary of Namibia
West of Nyae Nyae Conservancy block
North of Ondjou Conservancy block
Closest Town: Tsumkwe town in Nyae Nyae conservancy
Closest City -Windhoek the capitol of Namibia which is 650 km away.



N≠A-JAQNA
(named after the buffalo thorn tree)

Registered	July 2003
Address	N≠a-Jaqna Conservancy PO Box 1049, Grootfontein
Telephone	067 245047
Approximate population	7,000
Main home language	Ju'Hoansi
Area	9,120 square kilometres
Region	Otjozondjupa
Geographical features	Average annual rainfall of 400-450 mm. Kalahari sands cover flat lands spe 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 staff at present; two game guards trained in trophy hunting, monitoring and data collection techniques; wildlife monitoring using Event Book monitoring system
Enterprises	Omatako Valley Rest Camp (community rest camp); Grashoek Cultural Village; crafts; trophy hunting; own-use hunting; dry wood harvesting project, devil's claw harvesting.
Support agencies	MET, WIMSA (main support NGO), NNF, IAC, WWF In Namibia, CRIAA, ICEMA, NNDFN


18°45'0"E
19°0'0"E
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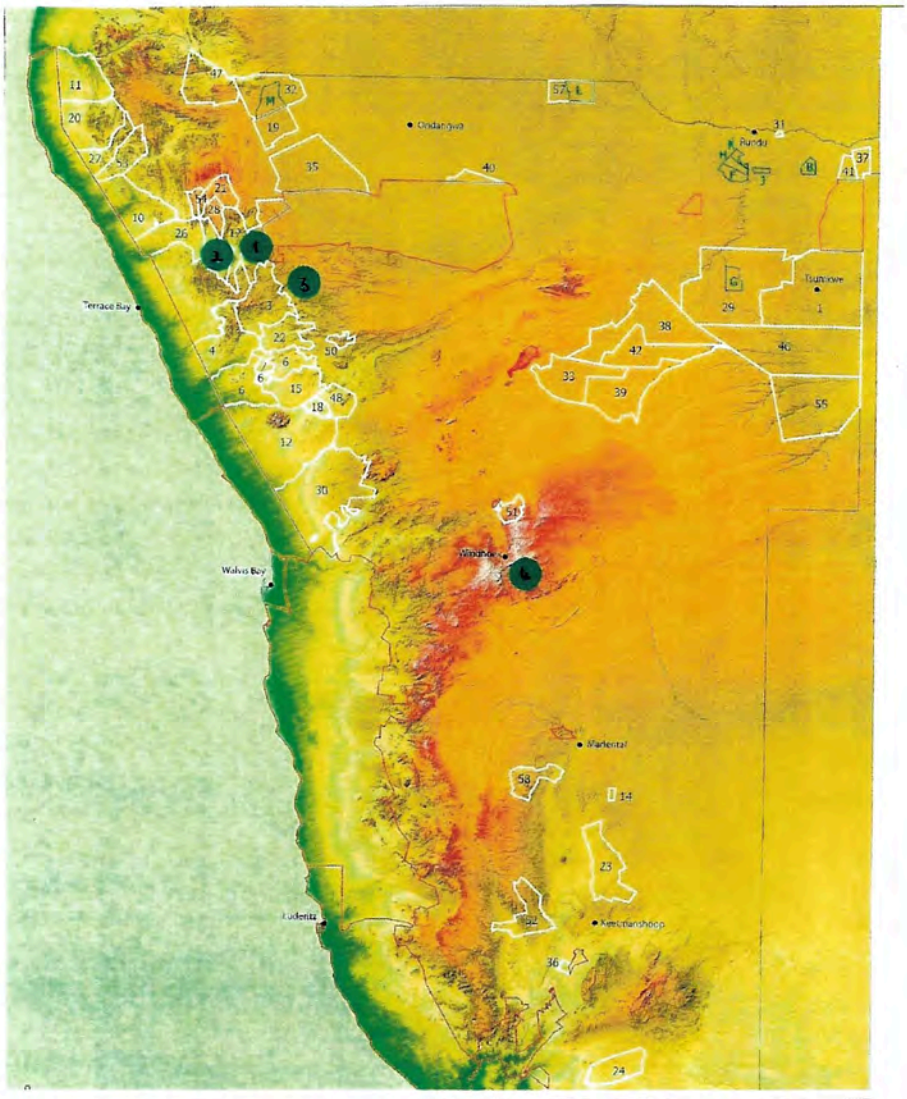
19°15'0"S
19°30'0"S
19°45'0"S
20°0'0"S
Legend
Small town/main settlement
Settlement
Borehole
School
Health facility
Air strip
Main road
District road
Track
Main river
Minor river
Farm
N#a-Jaqna Conservancy
Communal conservancy
Management Zones
Camp
Community forest
Mixed farming
State forest
Wildlife
N#a-Jaqna
Nyae Nyae
Okatjoruu
Ondjou
Malopeledoom
Luhebu
Aasvoëlnes
Mangetti Dune
N#a Jaqna Conservancy
of
Namibia
Kilometers

The N#a Jaqna block is number 29 on the below map.



e. If the concession borders a national park, please provide the park name: Concession does not border the Khaudum National Park, but lies 30 km south west of the Park

f. Description of general and distinctive habitat features and any water features:

Habitat:

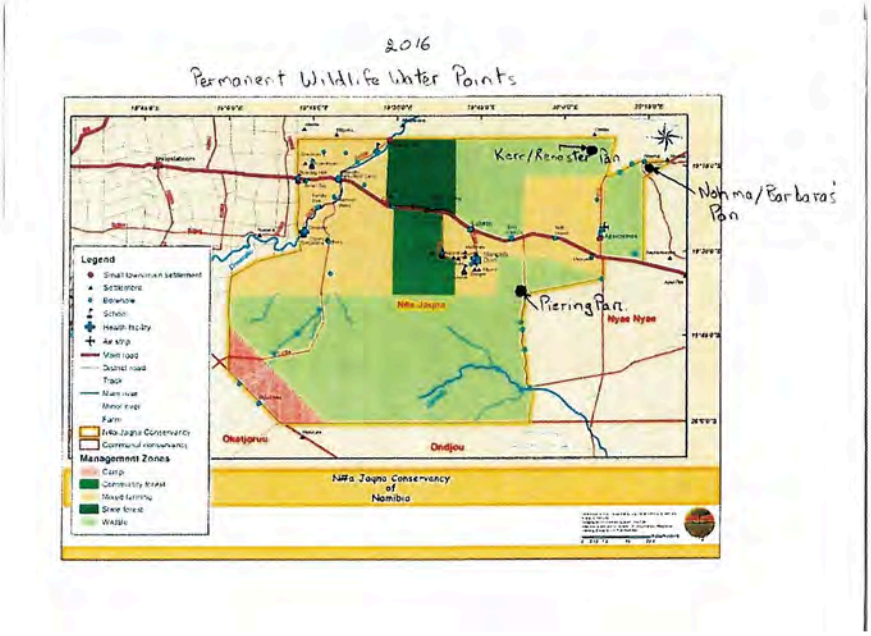
Average annual rainfall of 400-450 mm.

Kalahari sands cover flat landscape of broadleaf and acacia woodland.

Prehistoric dunes formed by Eolic sands blown in from the west coast of Namibia offers excellent habitat of broadleaf trees, yearly grass, rose thorn and raisin bush on the dunes while the area between the dunes ("dune streets") have plenty of climax grass species, black & white thorn acacia, and silverleaf terminalia trees offering a big variety of food for herbivores (browsers) as well as elephant. Some huge grass plains exist in the concession making it the ideal habitat for grass feeding species like springbuck, Burchell zebra, and red hartebeest as well as predators like cheetah which needs open spaces to hunt.

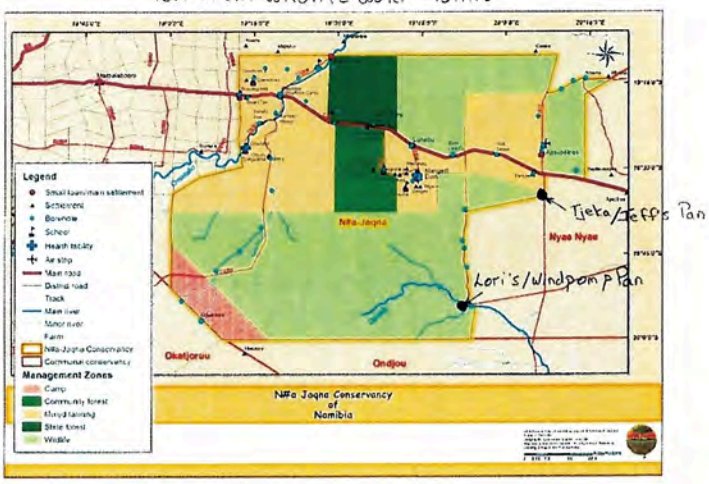
Water Features:

A number of Permanent Wildlife Water points (PWWP's) have been established in the N#a Jaqna Concession Block since 2016 when we started operating in the block.



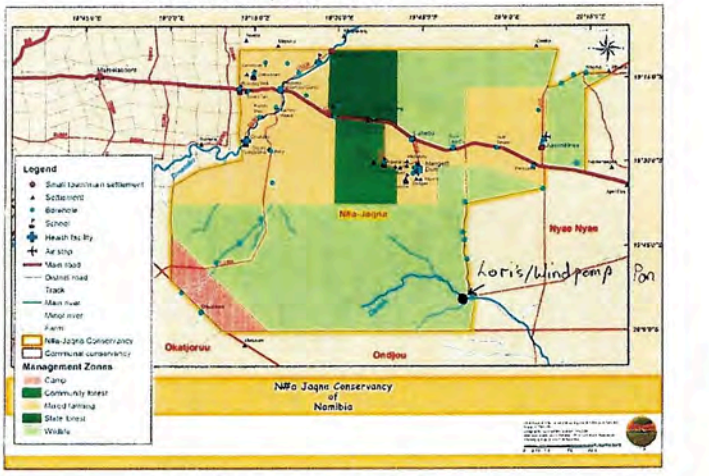
2017

Permanent Wildlife Water Points



2018

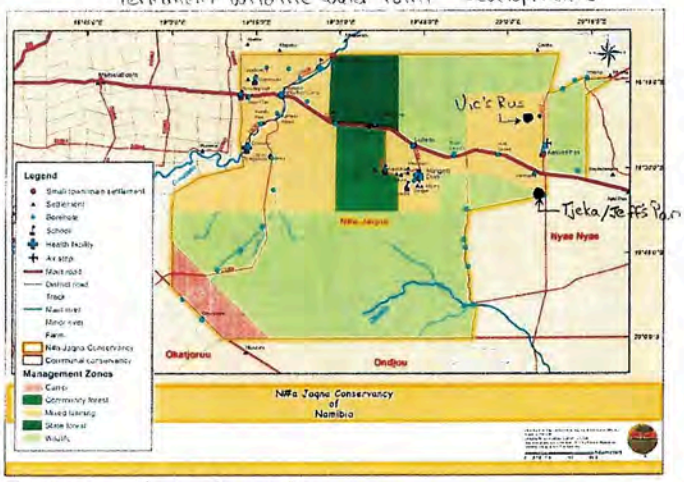
Permanent Wildlife Water Points



Lori's Pan Repaired and Solar System re-installed

2019

Permanent Wildlife Water Point Developments



Jeffs / Tjeka Pan - Cement Dam
Vic's Rus - Solar Pump & Cement Dam

TOTAL WATER DEVELOPMENT COST – 2018

Thormahlen & Cochran Safaris removed the entire Solar Panels and Pump at Lori's Pan and transported it back to Windhoek to be repaired.

Total invested in Wildlife Water Points in 2018 in N#a Jagna Conservancy is:

- Company Vehicle Transportation of Solar's to Windhoek and back – N$19,536
- Repair Cost at Cedar Solar – N$26,000
- Cement Cost – N$1,000
- Casual Labour Cost – N$6,000
- PH Labour Cost – N$11,666
- Steel Pipe, Welding Rods, Grinder blades etc. – N$1,200
- Petrol for Generator Welder– N$4,000
- Trailer Rental -N$13,600

TOTAL COST INCURRED 2018– N$83,002

Total Invested in Wildlife water Points from 2016-2018 in N#a Jaqna Conservancy:
Wildlife Water Point Cost 2016 – N$590,129
Wildlife Water Point Cost 2017 – N$232,000
Wildlife Water Point Cost 2018 – N$83,002
TOTAL COST INCURRED 2016-2018 – N$905,131

3. Are there any communities living in the concession? _X_ Yes __ No
   a. If so, estimated number of people or villages in the concession?

Approximate San (Bushman) Population- 7,000

4. Are there communities bordering this concession? _X_ Yes __ No

   a. If so, estimated number of people or villages around the concession?

Approximate Populations:
Nyae Nyae Conservancy on Eastern border- 2,300 San tribe
Ondjou Conservancy on southern border- 2,000 Otjiherero tribe
Kavango Region on northern border– Cattle Farms -Kavango tribe
Western Border- Cattle Farms – Mostly White Farmers

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	Dense	450-550	Rapidly Upwards due to PWWP (permanent wildlife water point) installations	Trail cameras at Water Points /Game Scout Sightings / Sightings by Hunting Guides / Tracks /MET
Lion	None	None	None	N/A
Leopard	Abundance	112-120 Average territory size is 8,000 ha	Stable	Trail Cams /Tracks/Sightings in Daytime
Cheetah	Sparse	20	Stable over last 3 years. Would like to relocate some cheetah with into the concession with collars when more game is available	Tracks / Sightings
African Wild dog	Dense	22-25	Stable over last 3 years. Would like to collar some Wild Dog when more game is available	Tracks/Sightings on the road and at waterholes
Caracal	Dense	100 +	Stable	Tracks / Sightings
African Wildcat	Dense	100 +	Stable	Tracks / Sightings
Spotted Genet Cat	Dense	100 +	Stable	Tracks / Sightings
Spotted Hyena	Average	30 +	Stable	Tracks / Sightings / Trail Cams

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Brown Hyena	Dense	75 +	Upwards	Tracks / Sightings / Trail Cams
Giraffe	Sparse	4-5	Stable	Tracks/Sightings
Cape Eland	Average	400 +	Upwards	Tracks/Sightings
SG Kudu	Sparse	100	Stable	Tracks/Sightings
Blue Wildebeest	Sparse	20	Stable	Tracks / Game Scouts
Steenbuck	Dense	1,000	Stable	Sightings / Tracks
Common Bush Duiker	Dense	1,000	Stable	Sightings / Tracks
Gemsbuck	Average	400 +	Upwards	Sightings / Tracks
Roan Antelope	Sparse	32 - 37	Upwards – Roan coming in from Nyae Nyae due to PWWP's installed on our Nyae Nyae border	Sightings / Tracks
Porcupine	Abundance	1,000 +	Stable	Sightings / Tracks
Guineafowl	Abundance	1,000 +	Stable	Sightings / Tracks
Francolin	Abundance	2,000 +	Stable	Sightings / Tracks
Doves	Abundance	10,000 +	Stable	Sightings / Tracks

6. Total employment number:

   Permanent Camp Staff – 6

   Casual Workers -20

   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	6	2
Trackers	7	1
Anti-poaching scouts/rangers	Scouts -8 / Anti-poaching - 8	8
Other anti-poaching	Anti-poaching Casuals -20	20
Cooks/housekeepers	Cook / Housekeepers - 2	2
Community coordinators	Management Committee - 9	9
Managers	2	1
Biologists		
Skinner	1	1
Tracker & Trainee Guide	1	1
Camp Attendant	1	1

7. Number of staff employed in the off-season:

   Camp Staff Permanently employed – 6

   Community Game Scouts employed -8

   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	Community Game scouts x 8	8	Jan-Dec
Casuals Anti-Poaching Staff	Casual Workers x 20	20	Dec-Feb
Managers	2	1	Dec-Feb
Maintenance			
Road opening/construction	Casuals x 20	20	March-Nov
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff:

      Community Game Scouts – Permanent -8

      Casual Anti-poaching Squad - 20

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? During & Off Seasons patrols are done on foot, and with landcruiser vehicle.

   c. Months during which anti-poaching patrols are conducted: Jan - Dec

   d. Number of anti-poaching patrols per month: 4

   e. Description of anti-poaching equipment, vehicles, etc.: Operator allocates a landcruiser hunting vehicle to anti-poaching during the off season. Done mostly on foot during the

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

hunting season, plus guides moving around in the concession during the hunting season. **Need funding to buy four-wheeler quad bikes**

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Operator & Conservancy Management Committee

g. Do you offer rewards to poaching informants leading to arrest? _X_ Yes __ No

h. Do you offer rewards to poaching informants upon conviction? _X_ Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **Namibian Dollar – N$**

Type of expense	Spending 2016	Spending 2017	Spending 2018	Remarks
Salaries for anti-poaching scouts	Game Scouts: 8 @ N$1,000 pm -N$96,000 Casual Team: 20 @ N$1,000 pm - N$40,000	Game Scouts: 8 @ N$1,000 pm -N$96,000 Casual Team: 20 @ N$1,000 pm - N$40,000	Game Scouts-: 8 @ N$1,000 pm N$96,000 Casual Team- : 20 @ N$1,000 pm N$40,000	Game Scouts-12 months Casual Scouts – 2 months
Equipment-Uniforms	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	Scouts x 8 Casuals x 20
Vehicles	N$20,000@ N$10 ,000 per month	N$20,000@ N$10 ,000 per month	N$20,000@ N$10 ,000 per month	Monthly cost of allocating land cruiser to anti-poaching
Diesel	N$50,000	N$50,000	N$50,000	
Rewards paid	-	none	none	
Other: _____	-			
Other: _____	-			
TOTALS	N$332,000	N$332,000	N$332,000	

9. Anti-poaching results:

Category	2016	2017	2018	Remarks
Poaching incidents discovered	13	9	4	Meat poachers
Ivory poachers arrested	none	none	none	No ivory poachers yet
Meat poachers arrested	none	none	3	Eland & Gemsbuck poached
Other poachers arrested	none	none	none	-
Poachers convicted	none	none	3	Locals -took them to tribal court where they got fines
Snares/gin traps collected	0	1	0	Poachers hunt with horses and on foot with dogs
Firearms confiscated	none	none	none	Spears & Bow Arrow
Vehicles confiscated	none	none	none	-
Bicycles confiscated	none	none	none	-
Boats/nets confiscated	-	-	-	-
Tusks recovered	N/A	N/A	N/A	No Ivory poaching yet
Carcasses observed	2	1	1	Gemsbuck & Eland
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? _X_ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution

Communities gets 100% of money contributed by Hunters for non-exportable game (Own Use Quota). The Donation for a Non-Exportable elephant is US$15,000 of which US$3,500 goes to the community, and the rest is used to establish PWWP's in the concession as wildlife water points is our primary development goal. Without water the concession is just a "Green Desert" because all surface water seeps into the sandy soil. Two non-exportable elephant is on quota yearly. The Communal fee is a contractual fee.

Our clientele is primarily USA citizens who donate SCI Blue Bags with school stationary supplies. Each hunter hunting in the conservancy donates between one and two SCI Blue bags with school stationary at a value of US$200 each bag. Hence a minimum of 5-10 SCI Blue Bags is donated at a value of N$13,500 to N$27,000. The SCI Blue Bag donations is a Voluntary fee.

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

c. Does the company provide game meat to nearby communities? _X_ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:

All the meat from trophy animals hunted, as well as the two Own Use Elephants on quota, must be delivered to community villages in the concession within 24 hours. The Conservancy Management Committee hands the trophy hunting operator a list of villages that need to get meat. Every villages have a representative that has to sign for the meat when delivered.

This is an Obligation stipulated in the Trophy Hunting Agreement. Failure to do so is punishable with a fine of N$22 per kilogram of the average carcass weight of the different animals. Failure to pay the fine is a breech of contract with immediate suspension.

Meat Value – N$:
Elephant x 4 @ 4,500 kg carcass weight @ N$22 / kg = N$396,000
Eland x 1 @ 350 kg carcass weight @ N$22 /kg = N$7,700
Gemsbuck x 2 @ 100 kg carcass weight @ N$22 = N$4,400
Warthog x 1 @ 30 kg carcass weight @ N$22 /kg = N$660
Steenbuck x 4 @ 7 kg carcass weight @ N$22 /kg = N$616
Duiker x 2 @ 10 kg carcass weight @ N$22 / kg =N$440
Total Annual Meat Value = N$409,816.00

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.

Very little fields in the concession area. Up till now no PAC animals declared.

The N#a Jaqna Concession block is not a horticulture area, and very little crops are raised. Mainly cattle, goats, donkey, and horses are raised by community members.

When an elephant damages any property, problem elephant situations are raised by the local community and it is addressed with the Chairman of the Community. The chairman then reached out to the Minister of Environmental and Tourism, who investigates the Wildlife Human conflict, and approves the problem animal permit in writing when enough evidence is collected by the Ministry. The Chairman then reached out to the Hunting Operator to provide a client. If a suitable client is found, there is a certain time limit to hunt the animal and the permit will be issued with the client's details.

The Operator must pay the community a predetermined contractual fee for the problem animal, and the meat has to be distributed to villages on the meat delivery list as per contract

f. Please describe any consolation payments made to residents damaged by game species. What currency are the expenditures reported in?

No consolation payments made to residents as the only cattle in the concession is owned by illegal landgrabbers. Court eviction case was won by the Conservancy in November 2017, some of the illegal farmers left, but some is still hanging in there. Any damages on livestock is welcomed by the San community in the concession.

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	N/A			
Lion	N/A			
Leopard	N/A			
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **Namibian $**

Type of project	Spending 2016	Spending 2017	Spending 2018	Remarks
Education (e.g., classrooms, offices)	-	-	-	-
Education (e.g., school fees, supplies)	N$125,000	N$125,000	N$125,000	School Stationary donations to the communal schools
Health (e.g., clinics, offices)	-	-	-	-
Health (e.g., medical salaries, equipment)	-	-	-	-
Community scout salaries	Casual Team: 20 @ N$1,000 pm - N$40,000	Casual Team: 20 @ N$1,000 pm - N$40,000	Casual Team: 20 @ N$1,000 pm - N$40,000	Casual Scouts – 2 months employed in off season
Other community anti-poaching- Uniforms	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	N$126,000 @ N$4,500 per person	Scouts x 8 Casuals x 20
Local government activities	-	-	-	-

Water infrastructure improvements	- N$590,129	N$232,000	N$83,002	Wildlife Water Points
Sports teams funded	N$4,500	N$4,500	N$5,000	Soccer Team Uniforms
Construction materials donated	N$994,280	N$0	N$83,280	Trophy Hunting Camp, which is donated back to community at end of 2018 to lease to operator
Salaries & Training Camp Staff	N$621,320	N$375,000	N$303,000	Training and Salaries done
Trophy Fees Paid to Community	N$916,891.53	N$880,170.00	N$838,880	Trophy Fees for Game
Meat Delivered	N$409,816.00	N$409,816.00	N$409,816.00	Meat Delivered
Airstrip Rehabilitation	-	-	N$236,300	
TOTALS	**N$3,827,936**	**N$2,192,486**	**N$2,013,978**	

EXECUTIVE INVESTMENT / COST SUMMARY

TOTAL SALARIES & TRAINING COST- 2018

Thormahlen & Cochran Safaris spent the following amounts on training and labour in 2018:

- **Training of Camp Staff-N$75,500**
- **Camp Staff Salaries – N$120,000**
- **Casual Labour Salaries – N$108,000**
- **TOTAL COST – N$303,000**

TOTAL WATER DEVELOPMENT COST – 2018

Thormahlen & Cochran Safaris removed the entire Solar Panels and Pump at Lori's Pan and transported it back to Windhoek to be repaired.

Total invested in Wildlife Water Points in 2018 in N#a Jagna Conservancy is:

- Company Vehicle Transportation of Solar's to Windhoek and back – N$19,536
- Repair Cost at Cedar Solar – N$26,000
- Cement Cost – N$1,000
- Casual Labour Cost – N$6,000
- PH Labour Cost – N$11,666
- Steel Pipe, Welding Rods, Grinder blades etc. – N$1,200

- Petrol for Generator Welder– N$4,000
- Trailer Rental -N$13,600

TOTAL COST INCURRED – N$83,002

Total Invested in Wildlife water Points from 2016-2018 in N#a Jaqna Conservancy:
Wildlife Water Point Cost 2016 – N$590,129
Wildlife Water Point Cost 2017 – N$232,000
Wildlife Water Point Cost 2018 – N$83,002
TOTAL COST INCURRED 2016-2018 – N$905,131

Proposed Wildlife Water Point Investment on Tender:
Wildlife Water Point Cost Proposed 2016 -N$200,000
Wildlife Water Point Cost Proposed 2017 -N$250,000
Wildlife Water Point Cost Proposed 2018 -N$250,000
TOTAL PROPOSED WWP COST – N$700,000
(WWP-Wildlife Water Point)
This leaves us with a credit balance of N$204,631 compared to our proposed goal of N$700,000 in the first three years.

"NO ENTRY" SIGNS COST - 2018

- Invoice 10 x Primary Signs – N$9,890
- Invoice 26 x Secondary Signs – N$11,143.50
- Cost of Steel for 36 x Frames @ N$955 ea – N$35,820
- Welding Rods @ 5 kg -N$600
- Petrol for Generator to weld @ 200 litre – N$3,200
- Labour to manufacture Frames x 6 days x 2 staff @ N$75 ea pd – N$900
- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$3,000
- Cement x 10 bags @ N$100 – N$1,000
- Staff Labour to put up signs x 5 days x 2 staff @ N$75 pd ea – N$750
- Guide C Joubert Labour to put up signs x 5 days @ N$500 pd -N$2,500
- Vehicle to put up signs x 1,500 km @ N$6 per km -N$9,000

TOTAL COST TO PUT UP CURRENT SIGNS – N$77,803

PROJECTED COST OF FUTURE NO ENTRY SIGNS

- Invoice 10 x Primary Signs – N$9,890
- Invoice 130 x Secondary Signs – N$55,717.5
- Cost of Steel for 130 x Frames @ N$955 ea – N$129,350
- Welding Rods @ 25 kg -N$3,000
- Petrol for Generator to weld @ 1,000 litre – N$16,000
- Labour to manufacture Frames x 21 days x 2 staff @ N$75 ea pd – N$3,150

- Labour to manufacture Frames by Guide C Joubert @ N$500 pd – N$10,500
- Cement x 50 bags @ N$100 – N$5,000
- Staff Labour to put up signs x 25 days x 2 staff @ N$75 pd ea – N$3,750
- Guide C Joubert Labour to put up signs x 25 days @ N$500 pd -N$12,500
- Vehicle to put up signs x 2,500 km @ N$6 per km -N$15,000

TOTAL PROJECTED COST TO PUT UP FUTURE SIGNS – N$263,857.50

CAMP DINING AREA REPARATION COST

- Thatching Grass – N$25,000
- Vehicle Cost -N$6,480
- Trailer Rental Cost – N$6,800
- Thatching Cost – N$3,000
- Thatcher Salary -N$4,500
- Casual Workers' Salaries -N$22,500
- PH Salary -N$15,000

TOTAL REPERATION COST – N$83,280

N#A JAQNA AIRSTRIP REHABILITATION COST

- Casual Labor Cost – N$54,000
- Grader Cost – N$6,000
- Vehicle Cost -N$40,000
- Big Game PH Salary Cost – N$50,000
- Steel Wire to fence off Airstrip for Airplane Safety – N$33,000
- Anchor Poles – N$12,000
- Dropper Poles – N$21,700
- Trailer Rental -N$8,500
- Steel Gate – N$1,000
- Windsock -N$3,500
- Windsock steel post -N$1,000
- Cement -N$2,000
- Molopo Tree Poison – N$3,600

TOTAL AIRSTRIP COST – N$236,300

TOTAL DEVELOPMENT / INVESTMENT COST - 2018

TOTAL INVESTMENT - N$783,385

was invested in N#a Jagna conservancy in 2018 in order to develop the previously marginal concession into a prime trophy hunting concession.

We saw the potential and took the risk to invest an enormous amount of money, time, and labor into the concession in 2016. Something no trophy hunting operator was willing to do in the last 11 years prior to us getting involved. And it is paying off as huge amounts of game is moving into the area!!

- Wildlife water points x 5 are now operational with Solar Pumps Installed.
- Cutline's of over 50 km were made.
- An additional 40 km of Hunting Roads were cleared.
- A super luxury Trophy hunting camp was built.
- Camp is fully Operational.

With five San community members trained to run and manage

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.?

We operate in South Africa and Namibia, and the figures below, is for the whole operation. In N#a Jaqna we only hunt what is allocated on quota, and it is fixed by the Government. The Namibian Government, specifically the Minister of Environment and Tourism, set strict quotas at the beginning of every three years, revising it at the end of each year when the Hunting operator must submit a Hunting Report on that specific year. So, before the client arrives, the hunting operator must take out a hunting permit – and this is only available if it falls within the quota that was pre-approved.

Current N#a Jaqna Trophy quota: 2 x trophy elephant, 2 x own use elephant, 4 x Steenbuck, 3 x leopard, 2 x Oryx, 1 x warthog. 1 x duiker.

The table below is for the total of Thormahlen & Cochran's concessions:

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all other species
Number of U.S. clients	2015: 4 clients 2016: 9 2017: 5 2018: 4	2015: 2016: 2017: 2018: 1	2015: 2 clients 2016: 9 2017: 9 2018: 10	2015: 126 clients 2016: 110 2017: 141 2018: 83
Percentage of U.S. clients	2015: 99 % 2016: 98 % 2017: 100 % 2018: 98 %	2015: 2016: 2017: 2018: 100 %	2015: 100 % 2016: 98 % 2017: 99 % 2018: 100 %	2015: 95 % 2016: 96 % 2017: 97 % 2018: 95 %
Trophy fees paid by U.S. clients – US$	2015: $220,000 2016: $495,000 2017: $275,000 2018: $260,000	2015: 2016: 2017: 2018: $75,000	2015: $42,000 2016: $225,000 2017: $256,000 2018: $265,000	2015: $303,715 2016: $1,075,000 2017: $997,375 2018: $410,110

12. Dollar amount and percentage of the company's revenue from U.S. clients:

    95 %

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.

    ENHANCEMENT INFORMATION

    Hunting Policies:

    Elephant – Our Company policy is to hunt only bulls older than 55 years of age. We work hard not to hunt elephant under 50 years of age, irrespective if it is a Trophy Bull, or Own Use bulls. We would like to change the Own Use bulls on quota to Trophy Bulls as it is financially much more lucrative for both the community and the hunting Operator. At the moment Own Use Bulls is hunted with no payment towards the community. All monies made from the Own Use Bulls is invested back into the hunting concession by the operator for the instalment of Wildlife Water Points. Hunting post productive bulls ensures that the breeding is not disturbed and enhances trophy quality.

    We follow the Aging Policy adopted and used with great success by the APNR - Association of Private Nature Reserves which is the Private Reserves adjacent of the Kruger National Park. The APNR uses the Aging Policy of the Kruger National Park in South Africa with great success and accuracy to determine tusk weight and bull age.

    Leopard – Our Outfit policy is to hunt male leopard of only 8 years and older, with a minimum year boundary of 6 years of age. This ensures that the breeding males can breed till they are 8 years old, without any disturbance. It works well as our trophy quality in the N#a Jagna Conservancy is improving every year as we adopted this policy since we started in the concession in 2016. We also see much more big cats in the concession as it seems that by taking out the old males it gives the breeding males more freedom and less competition from post productive males.

    Resting Areas

    There are two huge areas in the center north and south of the concession that has no roads and is used as resting / breeding areas. The concern however is that these two areas are used by poachers to operate from. We decided to open roads in these two areas, however conduct no hunting in these two areas, yet do anti-poaching patrols to keep poachers at bay.

CONCESSION IMPROVEMENTS

Trophy Hunting Camp

Please see the Annual Report for a detailed cost outlay of the Trophy Hunting Camp built, and donated back to the community after the third year, so the community can lease it to us to create a yearly income from the asset.

Airstrip

There are 2 Military Airstrips in the N#a Jagna Conservancy, which was used by the South African Defense Force in the 80's – ONE AT the main village Mangetti Dune, and the second at another small village called Aasvoelnes. The Trophy Hunting Camp is located 19 kilometers from the airstrip at Mangetti Dune. We opened the airstrip , got permission to fence it off from the Traditional Authority, and graded it so we can charter our clients to this strip. Previously we are used the Tsumkwe airstrip in Nyae Nyae conservancy which is 70 km from the trophy hunting camp.

Roads

Please see Annual Report for Roads opened, and Cutlines (borders) opened between N#a Jagna Conservancy and Nyae Nyae Conservancies

Wildlife Water Points

Please see annual report for detailed outlay of Wildlife Water points installed in the concession.

Anti-Poaching Program

The N#a Jagna Conservancy Concession was a "green desert" up until we started operating in it. It was even advertised for closed bidding by the WWF as a "marginal" concession, with lot of challenges, i.e. illegal landgrabbers, illegal fencing, and no very limited water holes in the concession. The previous operator called "Eden Safaris", did nothing in the concession for 11 years it operated in the concession.

When we won the bid for the concession, we used own funds and drilled 2 strategic boreholes on the border with Nyae Nyae and the Kavango region. Within 10 months we had two resident herds of elephant and lots of other game – please see Annual Report for detailed outlay and maps. We also installed solar pumps at three existing boreholes to supply a constant supply of water which is very important to get game to become resident in the concession.

Our enhanced activity in the concession is deterring poachers at the moment, yet we see more and more horse and dog tracks as the poachers is entering from the neighboring Ondjou Conservancy, which is also one of our concessions we acquired at the beginning of this year! So we will have to start a very well-coordinated and managed anti-poaching program ASAP in both concessions. At the moment we use 20 casual workers to clear roads, and the same xasuals work as an anti -poaching squad during December, January and February while the season is closed (December & January), and in February we are still at the USA Hunting Conventions.

Our biggest constraint is funding! This concession is a pristine area of 2,25 million acres with the Wildlife Area being at least 750,000 acres big. The lack of funds is a big problem. We have approached SCI but they said they don't finance such programs. I am currently working on completing a Concession Grant Request to submit to DSCF- Dallas safari Club Foundation in the hope that we can get a grant to install more water points, open roads, and re-introduce game species so much needed by the San Community.

Up until then all our efforts are self-financed with contributions from hunters.

Restocking of Game

During the eighties locals, as well as white Namibian hunters say that Springbuck, Red Hartebeest, Warthog, Blue Wildebeest, Southern Impala, Ostrich, Eland, Tsessebe, Gemsbuck, Kudu, Giraffe, even Sable, and Roan occurred through the whole area in herds of hundreds and thousands. Today there are only eland, gemsbuck, and kudu left. We will have to re-introduce the species wiped out!

For that we need assistance with financing!

COMMUNITY UPLIFTMENT

SCI Blue Bag Donations

Thormahlen & Cochran Safaris prides ourselves that we motivate our clients to donate a " SCI Blue Bag" full of school stationary worth US$200 at a local school in the communal areas. Last year we donated around 70 blue bags at schools.

Food for School Children

Poverty in the Communal Areas is a way of live. It is disturbing to see school children who only get one meal a day at the school, consisting of grits and soya sauce. We have clients who donate funds towards the purchase of maize meal and soya sauce which we donate at the local schools so the children can be fed.

Meat Delivery

We pride ourselves that we deliver all meat, and intestines of all hunted animals within 24 hours to the list of villages supplied by the Management Committee. Even the remotest villages is served with meat to ensure that the community benefits from the hunted animals.

MANAGEMENT ACTIVITIES

RESEARCH

African Wild Dogs

There are around 22-25 African Wild Dogs in the N#a Jagna concession. We would like to put satellite collars on some of the dogs to be able to monitor their movement in the area. They are critically endangered as a species, and we would like to assist in securing their future by constantly monitoring them in our concession area. This will provide valuable research information as to their hunting success, and movement in the concession area.

Cheetah

A very small number of cheetah is present in the concession area. After securing the Wildlife Water Points; when re-located game species numbers are high enough, we would like to release cheetahs in the concession area. Some of the cheetah will also get satellite tracking collars to monitor and study their progress.

14. I declare that the foregoing is true and correct.

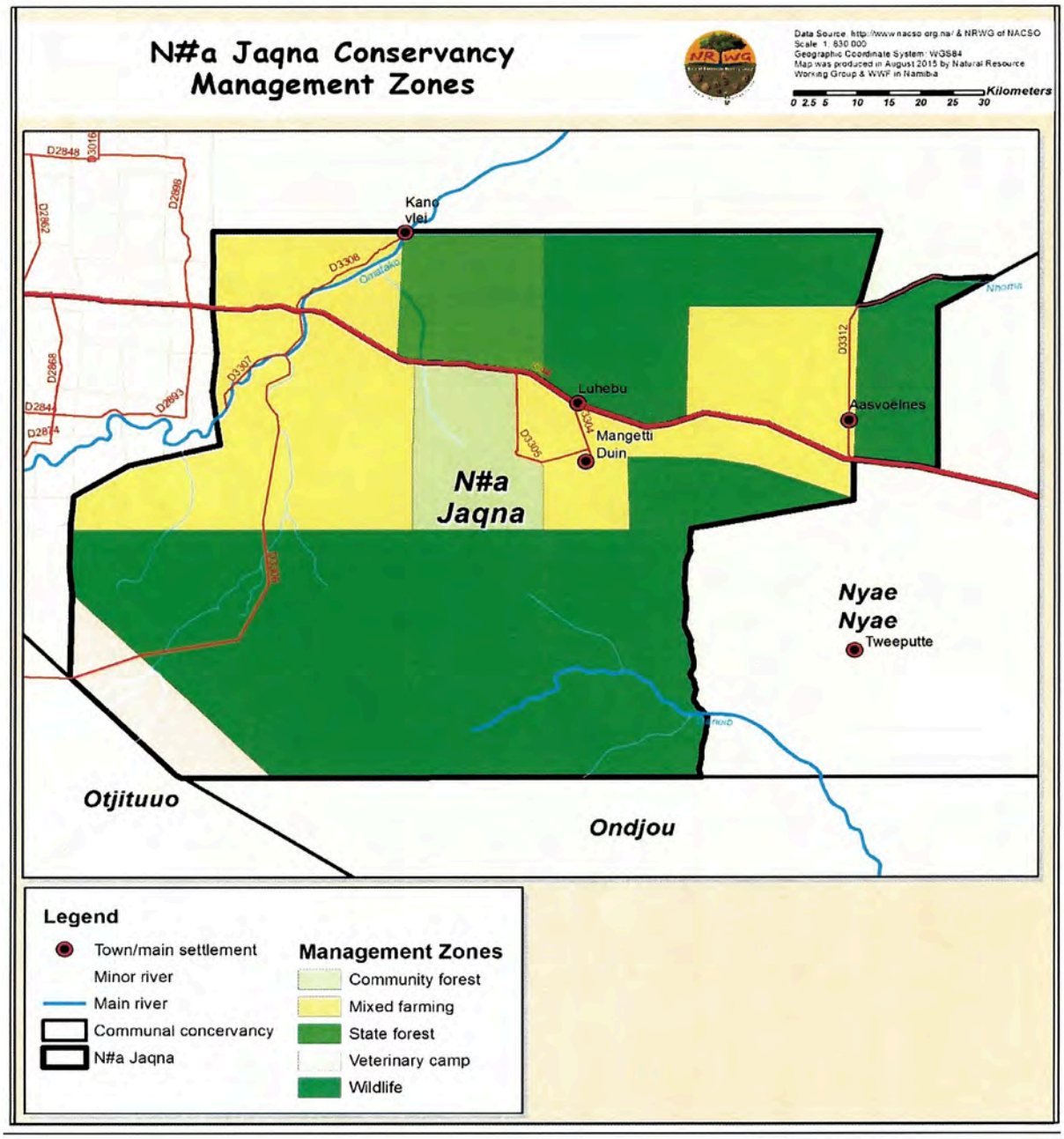
Signature:

Name: **Peter Thormahlen** Title: **Mr**

ATTACHMENT – 1 - Wildlife Water Point Development Schedule

1 **SCHEDULE 4**

Pledged activities and development;



2 **SCHEDULE 4**

Pledged activities and development;

Thormahlen & Cochran shall carry out all the items as stated in the Proposal to Na Jaqna for the first phase of the first three (3) years of the contract and attached as part of this agreement.

1. **TROPHY HUNTING CAMP**

T&C Safaris will build a Trophy Hunting Camp in N#a Jagna conservancy to Operate from. This camp will be built after an intensive study of the concession area keeping in mind water availability, impact on the concession, accessibility to hunting camp, distance from conservancy office etc. As well as recommendations from the N#a Jagna conservancy committee.

The Trophy Hunting Camp's permanent Structures will become the property of the Conservancy after the 3 year period expired.

2. **WILDLIFE WATER POINTS**

Please see Attached Map of N#a Jagna Conservancy.

The Wildlife Area of the concession was divided in three Zones:

- Block A
- Block B
- Block C

The Tender period is three years. Although it is understandable why an initial 3 year period is granted by the MET and WWF, it puts a lot of challenges in the road for a proper development program. The period is just too short for an operator to invest capital and to recover it before the tender period expires. On the other hand if the operator takes his chance and develops the conservancy as it should be developed, then I assume that his lease will be extended giving the opportunity to get the capital investment back over time. And hopefully the trophy quota will be raised due to more elephant in the concession which allows for more income and profits allowing capital investment to be recovered.

However given the limitations T&C Safaris proposes the following development plan:

BLOCK A

PHASE 1

Year One of Tender - 2016

Development of Block A would take part first as there are boreholes already in this block, but they are not in working order. It is also the block that borders Nyae Nyae conservancy which gives us the biggest opportunity to attract elephant into N#a Jagna, and to get them to become resident over time.

- Four existing Boreholes marked **+1, +2, +3, +4** on the Map in Block A will be cleaned out and Solar pumps installed with a watering hole. Two holes on the eastern border of N#a Jagna**(+1, +2)** bordering Nyae Nyae, and two boreholes in the western side of Block A **(+3, +4).** We budget on N$50,000 per solar pump and panels if the boreholes still have water and just need to be repaired and a solar pump and watering hole installed. If boreholes are dry we will still invest the N$200,000 for the year by drilling waterholes close to the old ones and installing solar pumps. **Reason being that + waterholes are located in river beds which are natural feeding areas for migrating elephant bulls. So by installing waterholes here enlarges the chance for migrating elephant bulls to smell the water while feeding in the riverine area so that they can discover the watering holes, use them and get used to them being permanent.**
- **Hence a Total of N$200,000 for 2016 will be invested**

PHASE 2

Year Two of Tender – 2017

- During this Phase Two strategic waterholes will be drilled in Block A. Depending on where the most elephant activity is the two holes will be drilled and solar pumps and watering holes installed. Our budget is N$125,000 per waterhole. Possibilities are Numbers **1, 2, or 3** on the map. **Reason being that numbers 1 & 2 is river beds which is natural feeding areas for migrating elephant bulls. So by installing waterholes here enlarges the chance for migrating elephant bulls to smell the water while feeding in the riverine area so that they can discover the watering holes, use them and get used to them being permanent.**
- **Hence a Total of N$250,000 for 2017 will be invested**

PHASE 3

Year Three of Tender – 2018

- During this Phase another Two strategic waterholes will be drilled in Block A. Depending on where the most elephant activity is the two holes will be drilled and solar pumps and watering holes

installed. Our budget is N$125,000 per waterhole. Possibilities are Numbers **4, 5, or 6** on the map. Number 5 waterhole is once again a riverine area which enhances the chance of elephant to bump into the waterhole. However now we go one step further and install watering holes **4,** and **6** in a "dead" zone where there may never have been even temporary water due to the Kalahari sand. With watering holes **1, 2, 5,** and **+ 3**, and **+ 4** having permanent all year water elephant will start wondering into this previously "dead "zone and back to the watering holes they know –numbers **1, 2, 5**, and **+ 3**, and **+ 4** to drink. Eventually they will discover watering **holes 6**, and **4** and the whole block will start to be utilized by migrating elephant which will over time turn into resident elephant.

- **Hence a Total of N$250,000 for 2017 will be invested**
- We will **drill Boreholes** and **install Solar Pumps** with watering holes – please see Development & Management plan outlay.

- **Transportation** is very important for the community due to the remoteness of the conservancy in the Bushmanland. However Wildlife Water Points is also a very high priority! Thormahlen & Cochran Safaris undertakes to let the N#a Jagna conservancy choose between either the Drilling of boreholes for Wildlife Water points, or a Vehicle in one of the three years. It is a difficult choice because the community may need a vehicle to transport community members, but on the other hand the only way we can develop the trophy hunting concession is by installing wildlife water points to attract elephant and other game into the conservancy.

- However, in the event that MET decides to enlarge the trophy quota, or if a Problem Elephant comes up and we sell it to a hunter, we undertake into buying of **a vehicle** for the conservancy. In the event of **a Problem elephant** we undertake to buy the vehicle in that year with the money made from hunting the bull with a foreign hunter, while we still proceed with the Wildlife Water Point Development & Management Plan. We do not encourage the declaring of a problem elephant just for the sake to buy a vehicle for the community! In the event that an elephant becomes a problem we undertake to use the funds made from the selling of that specific bull to buy a community vehicle.

- If there is a need for **a Satellite Dish & Television**, we undertake to buy a television with Satellite TV for the community hall as recreation, if a Community Hall does exist. If there is no **Nampower** we will also install **a Solar Power system with Batteries** for the community.

- If a **Community Hall** does not exist T&C Safaris undertakes to liaise with the N#a Jagna community into the building of a Community Hall if we are the successful bidder and we get another 2 years extension on the lease, so that we have a Five Year Contract..

- We will **Train and Sponsor the Training** of the members of the community as specified.

- In the event that the community needs **Salt Blocks** for their Cattle & Goats T&C Safaris will buy one ton of Salt Blocks per year for the community cattle.

- Training of the appointed Tracker to become **a Hunting Guide** in Year 3 (hence in October of the second year he will be sent to the hunting academy) of the Contract by sending him to the Volker Gruellmann Hunting Academy. The reason for sending him to the hunting academy in year 3 is for the member to gain hunting experience – on elephant, as well as baiting and hunting of leopard. It will be fruitless to send the member to the hunting academy if he has no trophy hunting experience. T&C Safaris undertakes to utilize the community member Hunting Guide so that he gain experience to become a master Hunting Guide and eventually a PH. With enough experience and if the potential exists the member could eventually qualify as a Big Game PH.

- When the N#a Jagna appointed Tracker qualifies T&C Safaris will appoint another **Tracker** in the community so that a Total of Six community members are permanently employed from year 3 onwards

- **Trophy Hunting Camp** will be built to conduct hunts from. Camp will consist of One Guest tent with en-suite bathroom, one Dining Tent / Lapa, one Kitchen tent, One Manageress / PH tent (tent will be divided in half to accommodate separate rooms), one PH /manageress Bathroom, and Five Staff Tents. A Skinning Area & Salt Room will be built for trophy skins. In the event that the Trophy Hunting Quota is enlarged a Second Guest Tent will be erected. The permanent fixed structures in the trophy hunting camp will become the property of the N#a Jagna community after the 3 year contract expires. In the event that our lease is extended we will negotiate with the community to Pay Rent to the community.

- **Donating of school supplies**. Our foreign hunting clients bring school supplies on a regular basis to Namibia – pencils, rubbers, etc.

3 SCHEDULE 5A

Envisaged Employment and Salaries:

Type of Local Staff To Be Employed	Estimated Number To Be Employed	Estimated Duration of Employment (please specify the number of days.)	Estimated Salary per Time of Employ (days)
Camp Staff- Trainee Chef/Manager-Female	1	365 days/12 months	N$65.75 p day/N$2000 p month
Skinner-Male	1	365 days/12 months	N$65.75 p day/N$2000 p month
Tracker-Male	1	365 days/12 months	N$65.75 p day/N$2000 p month
Other 1. Camp Attendant-Male	1	365 days/12 months	N$65.75 p day/N$2000 p month
2. Camp Lady -Female	1	365 days/12 months	N$65.75 p day/N$2000 p month
3.			

4 THE OPERATOR SHALL PROIVIDE FOOD TO ALL THE STAFF DURING THE PERIOD WHEN THEY ARE ON DUTY

5 SCHEDULE 5B

Types of training by operator:

Number of Local People to be Trained	Types of Training To Be Provided	Estimated Length of Training	Proposed Training Site	Commencement of training
1	Chef/Manager training	12 months (see below)	Windhoek Politec and in camp	Feb /March 2016
1	Tracker	See below		March 2016
1	Skinner	See below		March 2016
1	Camp Attendant	12 months	In house training	March 2016
1	Camp Lady	12 months	In house training	March 2016

6 **SCHEDULE 6**

7 **DOMICILIUM CITANDI ET EXECUTANDI**

The Conservancy: .....:

.....

.....

.....

The operator: .....

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.....

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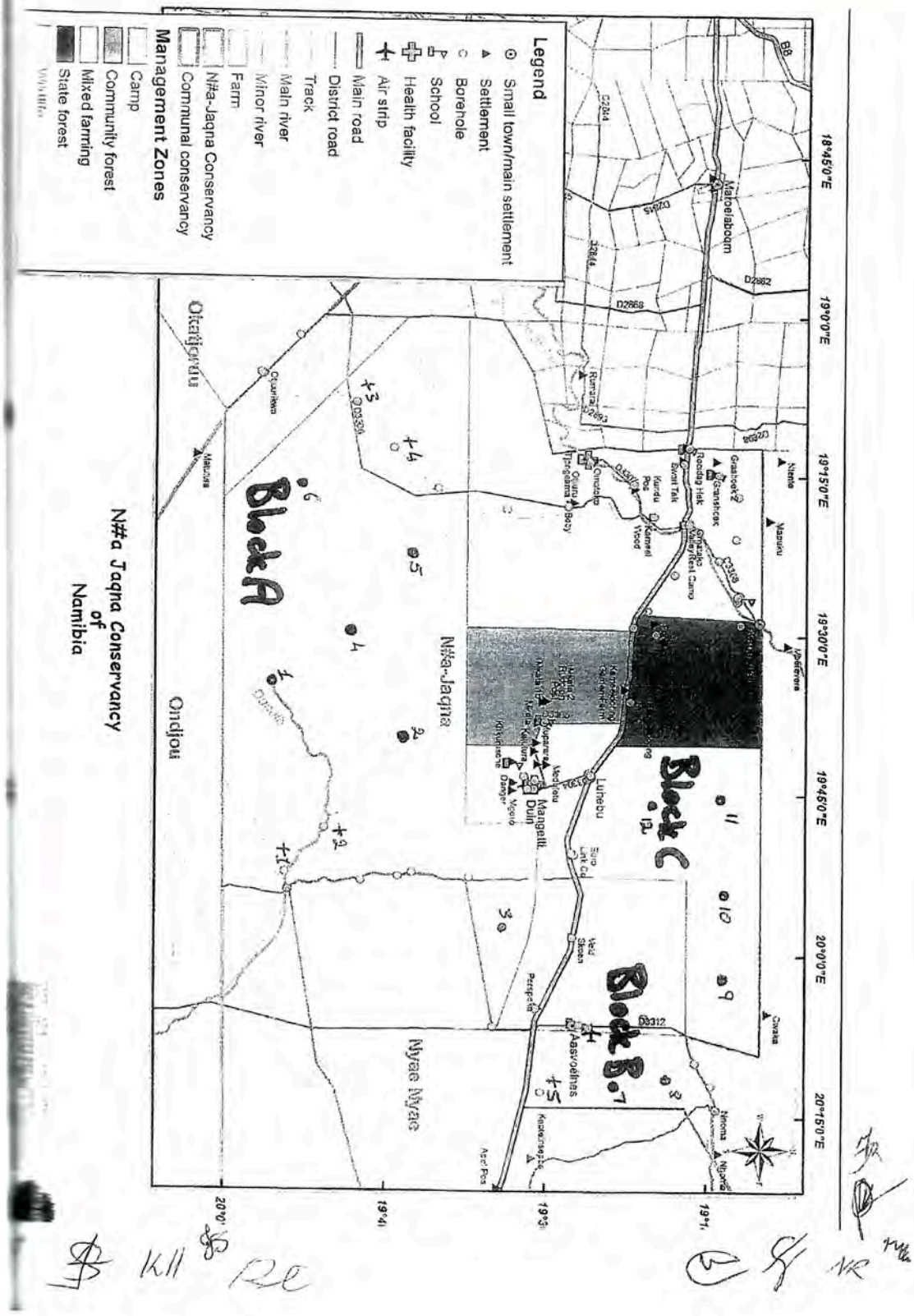
Legend
Small town/main settlement
Settlement
Borehole
School
Health facility
Air strip
Main road
District road
Track
Main river
Minor river
Farm
N#a-Jaqna Conservancy
Communal conservancy
Management Zones
Camp
Community forest
Mixed farming
State forest
N#a Jaqna Conservancy
of
Namibia
Block A
Block B
Block C
N#a-Jaqna
Ondjou
Nyae Nyae
Otjinjanda
Matoelaboom
Mapuru
Luiebu
Mangetti Dun
Asisvoelvlei
Owaka
Nkoma
Ngoma
18°45'0"E
19°0'0"E
19°15'0"E
19°30'0"E
19°45'0"E
20°0'0"E
20°15'0"E

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		180688
VALID FROM:		03.07.18
VALID TO:		15 Aug 06.07.18
RECEIPT No.:		5761913

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.L. Dement

Residential Address:

Country: U.S.A

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

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common		Springbok	—	Other	—
Buffalo		Klipspringer		Steenbok	2X	Jackal	2X
Crocodile		Kudu		Warthog		*Spotted hyena	1X
Dik-Dik		Lechwe		Waterbuck		*Please report back within 48hrs after hunt	
Eland	1X	Oryx (Gemsbok)	2X	Wildebeest, Black			
*Elephant	1X	Ostrich		Wildebeest, Blue	2X		
Giraffe	—	Reedbuck		Zebra Burchell's			
Grey Duiker	2X	Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: NTA Tsgwi Conservancy

Guided by (name of guides): A.M Albert

MINISTRY OF ENVIRONMENT & TOURISM
ISSUING OFFICER (NAME & SIGNATURE)
UNDER THE AUTHORITY OF THE MINISTER, POHAMBA SHIFETA IN TERMS OF SECTION 78 (1) OF THE NATURE CONSERVATION ORDINANCE, 1975 (ORDINANCE NO. 4

Official MET date stamp

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
2018 -07- 03
WINDHOEK PERMIT OFFICE
Private Bag 13306, Windhoek
Tel: 2842111 Fax: 258861

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

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
04/07/18	Elephant							0	Male	Nzuri Tembo Conservancy			(b) (6)	

*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
Republic of Namibia

SPECIES MANAGEMENT PLAN

Elephants

Loxodonta africana

December 2007

SPECIES MANAGEMENT PLAN

Elephants

Loxodonta africana

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FIGURES *(located after the Executive Summary)*

Fig. 1: Management of the Namibian Elephant Population – Options, Problems and Solutions

Fig. 2: Strategy for Management of the Namibian Elephant Population

MAPS *(located at the end of the document)*

Map 1: Elephant range in Southern Africa

Map 2: Elephant range in Namibia

Map 3: Land capability and economic returns from land use in Namibia

Map 4: The future range for elephant in Namibia?

Map 5: The transboundary range of elephants in relation to the Namibian population

GLOSSARY AND DEFINITION OF TERMS

Acronyms

CITES	- Convention on International Trade in Endangered Species of Wild Fauna and Flora
DPWM	- Directorate of Parks and Wildlife Management
DSS	- Directorate of Scientific Services
DWNP	- Department of Wildlife and National Parks, Botswana
GEF	- Global Environment Fund
KAZA	- Kavango-Zambezi
MET	- Ministry of Environment and Tourism
NNF	- Namibia Nature Foundation
PAC	- Problem Animal Control
TFCA	- Trans-Frontier Conservation Area
UNDP	- United Nations Development Programme
WWF LIFE	- World Wide Fund for Nature: Living in a Finite Environment programme

Definition of Terms

"Background Study": This refers to the *Background Study for Elephants* prepared under the Ministry of Environment and Tourism's **Transboundary Mammal Project** (Martin 2005).

"Caprivi" and "Caprivi Strip": The word 'Caprivi' is used throughout the Plan to refer to the 'peninsula' of land extending eastwards from the north-eastern corner of Namibia as far as its junction point with Botswana, Zambia and Zimbabwe at the confluence of the Chobe and Zambezi Rivers. The phrase 'Caprivi Strip' is reserved for the narrow 'isthmus' connecting the broader part of the peninsula to the main body of Namibia.

"Population and Subpopulation": In this report, the term subpopulation is loosely used to refer any geographically distinct subdivision of the overall population within a country.

"Kasane Workshop": A workshop was held in Kasane, Botswana on 30th November and 1st December 2002 in which representatives of the Namibian Ministry of Environment and Tourism and the Botswana Department of Wildlife and National Parks participated with the aim of collaboration on joint management issues affecting the buffalo population shared between the two countries. The *Background Study for Southern Savanna Buffalo* (Martin 2002) was presented at the workshop.

"Windhoek Workshop": A workshop was held in Windhoek on 23rd September 2003 in which representatives of the Namibian Ministry of Environment and Tourism and the Botswana Department of Wildlife and National Parks participated with the aim of collaboration on joint management issues affecting roan, sable and tsessebe. The *Background Study* and *Management Plan for Roan, Sable and Tsessebe* (Martin 2003) were presented at the workshop.

ACKNOWLEDGEMENTS

This plan is based on a draft elephant management plan researched, coordinated and prepared for the Ministry of Environment and Tourism (MET) by Rowan Martin in 2005, as part of The Transboundary Mammal Project of the MET, Namibia, facilitated by the Namibia Nature Foundation and the World Wildlife Fund's LIFE Programme.

EXECUTIVE SUMMARY

The status of elephants in the southern African region

The African elephant has achieved huge prominence in global conservation issues in the past 20 years. Few other species are capable of arousing emotions, polarizing viewpoints and causing controversy to the extent that *Loxodonta africana* has done. Within Africa opinions are divided on the subject of elephant management and the situation is no less contentious than in the international arena.

Elephants are classified as *Endangered* in the IUCN Red Data Book. In 1989, rightly or wrongly, the species was listed on Appendix I of CITES and legal trade in ivory was effectively banned. Although the Namibian elephant population was transferred to Appendix II in 1997, conditions attached to the listing have made it almost impossible for ivory to be traded.

In 2002, the population in the whole of Africa was estimated at about a half million elephants. The southern African region holds more than half of this population and, projecting at normal population growth rates, it is likely to be around 350,000 - 400,000 animals in 2007. Clearly, elephants are not threatened in southern Africa and this raises the question whether they can be validly classified as endangered at the continental level.

The largest concentrations of elephant in southern Africa are in a central zone extending across the continent between latitudes 15º - 20º south of the equator (**Map 1**). Within this zone, Botswana and north-western Zimbabwe hold some 250,000 elephants. The rapid expansion of these populations into neighbouring countries is affecting biodiversity and human livelihoods.

The 'elephant problem' is central in initiatives to create transfrontier conservation areas (TFCAs) in the region. The need for elephants to have access to far larger areas than those in which they are currently confined is recognized and, for many, TFCAs are seen as the solution to the increase in elephant populations. Unfortunately, a problematic legacy of national boundaries, coupled with a lack of coherent land-use planning in all of the participating countries including the Kavango-Zambezi (KAZA) TFCA (Angola, Botswana, Namibia, Zambia and Zimbabwe) means that this TFCA will undergo a long and difficult birth. Any respite arising from the increased range is likely to be short lived: at current rates of population increase, elephants will remain overabundant.

It would be highly desirable if a common management approach for elephants could be developed amongst the countries sharing the elephant range. However, the corollary to this is that, in the absence of any agreement with neighbouring countries, it cannot reasonably be expected that Namibia will not undertake management interventions in the best interests of its local peoples and conservation concerns.

The status of elephants in Namibia

Elephants occur across the entire north of Namibia (**Map 2**) with two main sub-populations in the north-east and the north-west. In 2004 the total population was estimated at over 16,000 animals and, allowing for underestimates on aerial surveys, the true number in 2007 is likely to be closer to 20,000.

The north-western population is about 4,000 animals and includes the elephants in Etosha. This appears to be growing at about 3.3% per annum and expanding its range. Elephants are being seen as far south as the Ugab River and in all of the river catchments which flow westwards to the Atlantic Ocean in the north. As yet, the extreme north-western part of the potential range along the Kunene River has not been re-colonized although elephants were present in this area until 1990.

The north-eastern population will probably reach 16,000 animals this year. The recent increases are well in excess of normal growth rates (which are less than 5% per annum) and must be attributed to the migration of the northern Botswana population (which consists of about 160,000 elephants) and the north-western Zimbabwe population of about 90,000 elephants.

The conservation status of elephants in Namibia is more than satisfactory – their numbers already exceed what many would consider desirable for the available habitats and they have been identified as a possible threat to other rare and valuable species which Namibia is trying to conserve. There are no limiting factors preventing an increase in their numbers.

Elephants are classified as *Specially Protected Game* under Namibian law. The original justification for such a listing may well have disappeared. To achieve the objectives of this Management Plan, several revisions to the legal provisions for elephants under Namibian legislation would be desirable.

Under Namibian environmental legislation, management plans are required for species that are rare or valuable and that share boundaries with neighbouring countries. Elephants are not rare but they are potentially valuable and, within multi-species wildlife systems, could provide a financial and economic return that greatly exceeds that possible from alternative land uses. A management plan that treats elephants as a valuable resource could transform the primary land use in northern Namibia.

The issues

In both the north-west and the north-east, conflicts with humans are escalating due to the increase in elephant and human population numbers. The benefits that communities receive from elephants on their land do not come close to compensating them for their losses. Farmers are not free to defend their livelihoods from elephant depredations and the current arrangements for control of problem elephants are too tardy to be effective. A potential threat to elephants is the inception of a wave of illegal hunting or retaliatory shooting by dissatisfied people.

In north-western Namibia, elephant populations have considerable latitude for increasing their range and the situation may not require management interventions for many years. However, in the north-east, the escalating levels of conflict between humans and elephants and the damage to vegetation suggest that the time for action has already been reached.

Initially, the problem in the north-east may appear intractable: the Caprivi, Khaudum and Nyae Nyae areas lie on the periphery of the largest elephant population in Africa. Management interventions carried out in isolation in Namibia will not affect the core elephant populations from where the problems emanate. The huge number of elephants south of the Caprivi presents Namibia with a management challenge: however, notwithstanding any decision by Botswana

and Zimbabwe not to manage their elephants, Namibia should take full advantage of the opportunity presented. The justification is that elephants are causing significant hardships for people and threatening conservation objectives in the north-east.

Namibia's short-term problem is to accommodate the current increase in elephants. However, it is not the long-term solution. Elephants do not regulate their own numbers at levels which maintain savanna woodland habitats – a process which culminates in population crashes. In the long term population reductions may be necessary. In the north-west, the management requirement may simply be to increase the range available to elephants: in north-eastern Namibia not only does the range need to be increased but, in some areas, the population may need to be reduced (**Fig.1** at the end of this Summary).

Technically, there are no good reasons why more land in Namibia should not be available to elephants. The highest valued land uses over most of this arid country (**Map 3**) are those based on management of natural resources. Moreover, the full potential is far from being realized at present due to national and international policy constraints that place wildlife at a competitive disadvantage with land use based on exotic species. Were subsidies to be removed from the domestic livestock industry and were it possible for elephant to play their full economic role in land use systems, it could reasonably be expected that large additional areas of land would be converted to wildlife management in areas where relatively low human densities would enable the co-existence of people and elephants, as elsewhere in the country – for example, parts of the northern Kavango, central northern regions and in the Eastern Caprivi. This would remove the short-term limiting factor of providing additional ranges for elephant.

The technical arguments for greater areas of Namibia to be put over to natural resource management will not, on their own, bring about the needed changes to remove this limiting factor for elephants. It will require a high level of political commitment and the correct suite of incentives to induce landholders (both communal and private) to convert to a land use based primarily on wildlife. The high level of political commitment is already in place. In a speech delivered on 3rd February 2004, His Excellency the Founding President, Dr Sam Nujoma, made the visionary statement that wildlife would be restored throughout the north of Namibia, that ownership of wildlife would be conferred on local peoples and that the economy would be transformed by diversification based on wildlife uses.

For elephants, two factors mitigate against realizing the Founding President's vision. The first is that the full value of elephant commodities (ivory, elephant skin and meat) cannot be realized due to international trading constraints. The second is that elephants in Namibia are effectively State property – which was clearly not the President's intent. These two major disincentives need to be addressed before the conditions for increasing elephant range will be achieved.

Full devolution of rights over elephants to landholders (on both communal and private land) is a prerequisite for creating the incentives to allow elephant populations to expand. It is a necessary but not a sufficient condition. Large areas co-managed between the State and relevant landholders will be necessary to provide viable ranges, to distribute the pressure of elephants on habitats and to allow population increase and expansion.

The Vision Statement developed under the current UNDP/GEF assisted project in Namibia provides for co-operation between stakeholders to achieve this far-sighted concept. Linkages

would be established under a co-management system which would both secure and increase the available range for elephant (**Map 4**).

In the north-east, elephant population reduction may be necessary. However, there are no simple answers to the question of how many elephants need to be removed – either to conserve biological diversity or to reduce conflicts between humans and elephants. The starting premise may be that the option of zero use is not a reality – elephants will be harvested illegally and unsustainably if facile attempts are made to debar their use. These all point towards a need for imaginative and innovative management. The aim should be to avoid routine cropping or culling programmes which attempt to impose constancy on naturally fluctuating ecosystems. The challenge is to make it sustainable, requiring an adaptive management approach.

Combining adaptive management with the arguments for co-management results in a classic situation where the principles of adaptive co-management in complex bio-economic systems need to be applied. The individuals who are most affected by elephants are those living in the north-east: together with the State authorities, they should decide how elephants should be managed.

MANAGEMENT PLAN

A feature of this management plan is just how few actions are needed to bring it to fruition. Success relies on a few administrative masterstrokes which will cost next to nothing – rather than a long list of expensive management activities. It would be as well for MET not to enter any co-management forums with preconceived moral positions on elephant. Having accepted that the solutions to the current 'elephant problem' may lie in innovative management inspired by the values of local people, a *tabula rasa* (or clean slate) is needed to accept with an open mind all options presented.

Vision, Goal, Objectives, Strategy and Actions

The Vision Statement begins with a preambular statement which expresses Namibia's desire to work with neighbouring countries and the international community to enhance the status of elephants, clarifies Namibia's position on elephants and draws attention to the fact that a policy of total protection for elephant will result in their available range being reduced to State protected areas and a decrease in their numbers. In contrast, a policy of sustainable use, as enshrined in the Namibian Constitution, will result in the expansion of the range available to elephants and an increase in their numbers. The goal and objectives then follow.

The **Strategy** consists of five actions which are listed below and shown in **Fig.2** (at the end of this Summary).

(1) **Devolution of authority for landholders, both communal and private, to manage elephants on their land**. This is a prerequisite for co-management institutions to be formed.

GOAL

Namibia wishes to carry the maximum number of elephants that is consistent with the conservation of biological diversity AND the wishes of those primary stakeholders who have elephants on their land

SOCIAL OBJECTIVE

1. **To reduce conflict between elephants and people**
2. **To create conditions under which elephants are a benefit to people**

ECOLOGICAL OBJECTIVE

1. **To increase the range available to elephant**
2. **To conserve biological diversity in State protected areas and promote the conservation of habitats outside State protected areas in the elephant range**

ECONOMIC OBJECTIVE

To enable the full economic potential of elephants to be realized according to the provisions for sustainable use in Namibia's Constitution

(2) **Representations on the location of veterinary control fences**. This is a matter for the Ministry to pursue from the outset of the management plan. The influence of veterinary fences on the current elephant range both in Namibia and in the region is profound. In the vicinity of the Mahango Core Area within Bwabwata National Park, there is a bottleneck caused by the veterinary fences on the southern boundary of the Caprivi and along the international border between Botswana and Namibia, which affects the entire regional range for elephant across the central southern African region (**Map 5**).

(3) **The removal of the CITES constraints affecting Namibia's ability to trade in ivory.** These constraints exert a negative effect on conservation of elephant in Namibia and act as a disincentive to the adoption of wildlife management as a primary form of land use. However, the management plan is worth pursuing even if the full value of elephant products cannot be achieved immediately – there are substantial values to be derived from elephants through tourism and international trophy hunting even if they fall short of the ideal.

(4) **Establish co-management institutions between the State and primary stakeholders.** Namibia's record of an expanding wildlife industry over the past 10 to 20

years is impressive. The present mosaic of parks, conservancies and commercial farms provides a sound foundation for the 'scaling up' of institutions needed for the management of elephant.

The new high-level institutional structure proposed for the State wildlife agency under the MET/UNDP/GEF project is ideally suited to this from a geographical perspective. The new divisions, subdivisions and sections are well matched to the elephant ranges that will require co-management institutions.

(5) **Apply adaptive management principles to the decisions of co-management institutions.** The agenda for co-management institutions would include the setting and allocation of trophy hunting quotas, problem animal control and population reductions.

The realization of the objectives in the Vision Statement should follow sequentially (**Fig.2**). Reduction of elephant populations in the north-east should help to conserve biological diversity; local communities should receive increased benefits from elephants and, hence, conflict will be reduced. With full devolution of rights over elephant, the incentives will be present for the elephant range to increase. The full economic objective will only be achieved when the permanent elephant range has expanded across northern Namibia (**Map 4**) and the last CITES constraints have been removed.

Risks

Given the escalating human-elephant conflict and the extreme modification of habitats in north-eastern Namibia, **the greatest risk to Government's position is to do nothing**. Failure to implement the necessary devolutionary measures and enter into co-management carries the real risk that local people will take matters into their own hands or, worse still, collaborate with illegal hunters from neighbouring countries. Inactivity will not simply result in the *status quo* being maintained. Since the 1970s, elephant populations have collapsed in an apparently inexorable process across Africa and it has occurred where the State has claimed ownership of elephants.

There is little risk that any management interventions could have an adverse effect on the status of elephant populations in Namibia. Populations are expanding and being augmented by migration from Botswana and Zimbabwe. Provided the effects are properly monitored, experiments in management will provide a learning experience.

Finance and Capacity

This management plan differs from other species management plans in that very little funding is required to implement it. The main costs lie in co-ordination and implementation of management activities that arise from co-management decisions. The potential income from elephant management is substantial and should more than cover these costs. Even if the full value of ivory and elephant skin is not achieved, the revenue from tourism and sport hunting will provide some 75% of the amounts required.

If elephant sport hunting were combined with reduction of elephant populations in the north-east, the expected revenue would be some **N$13 million** in the State protected areas (a total of 14,000km^2 including the Caprivi Forest Reserve) which would meet the present budget allocations for the north-east and would meet at least two-thirds of the budgets proposed under the MET/UNDP/GEF project. In the communal lands, the net

income/hectare (**N$8.7**) should more than offset the costs which elephant are presently causing through crop raiding and other damage. These figures do not include the net income of safari operators which would be about N$9.7/ha.

Transboundary Co-operation

Most of the management activities identified for potential co-operation and collaboration between Botswana and Namibia at the Kasane Workshop (2002) and Windhoek Workshop (2003) repeat themselves in this Management Plan.

The desirability of collaboration on elephant management among the countries participating in the KAZA TFCA was stated on the first page of this executive summary. A common approach to hunting quotas, problem animal control and population reductions would have the beneficial effect of not causing elephants to move from one country to another to escape different management regimes. This plan is structured so that the management of elephants on Namibian soil is not dependent on decisions by neighbouring countries: it is, first and foremost, a national plan. However, because it is based on adaptive management, decisions taken in co-management forums could be flexibly adjusted to accommodate collaborative management.

There are strong grounds for forming an alliance among Angola, Botswana, Namibia, Zambia and Zimbabwe specifically aimed at more effective performance in the CITES forum – based on the fundamental premise that all wildlife products should have value and legal trade is beneficial for conservation.

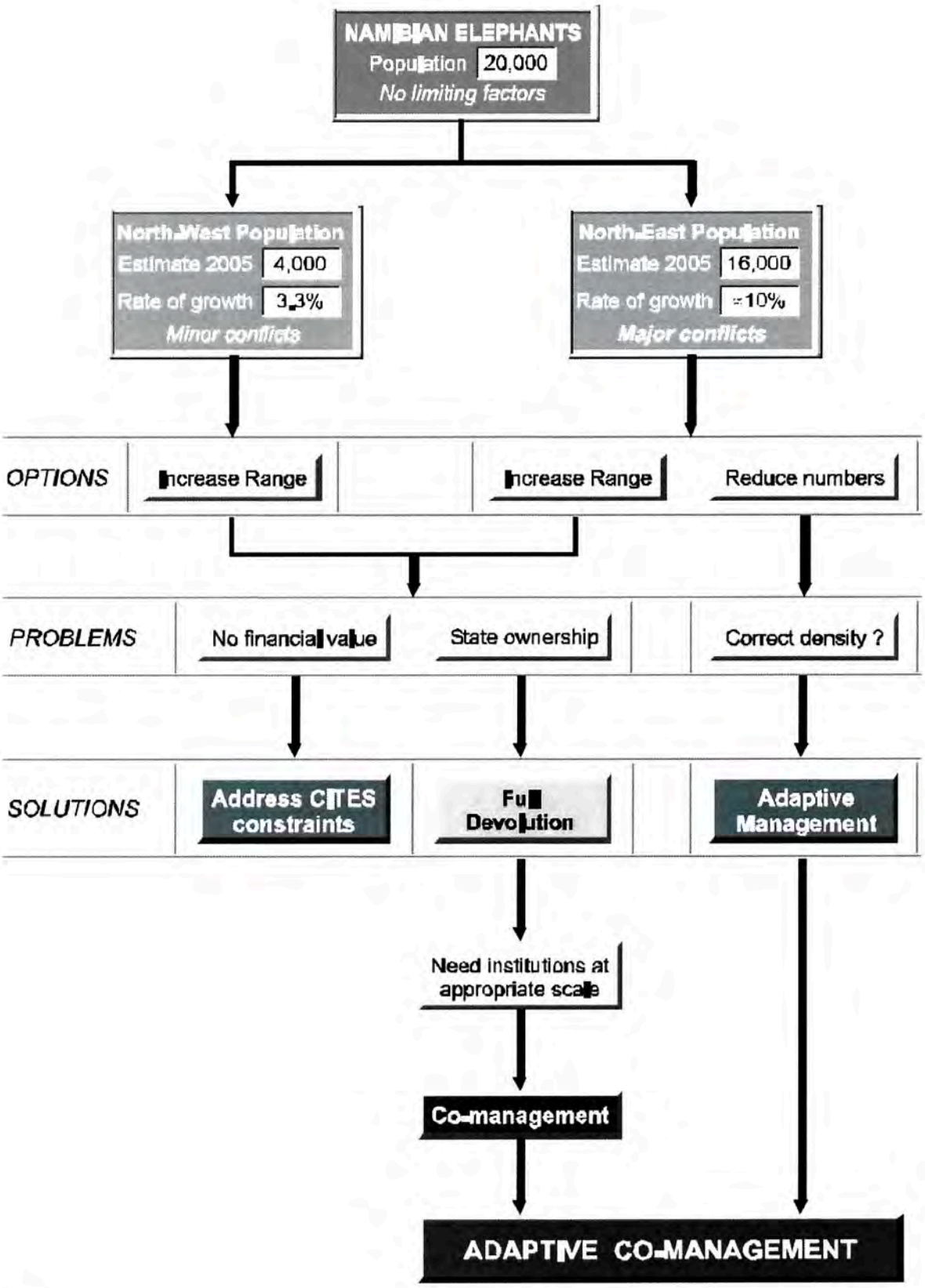

Fig. 1: Management of the Namibian Elephant Population – Options, Problems and Solutions

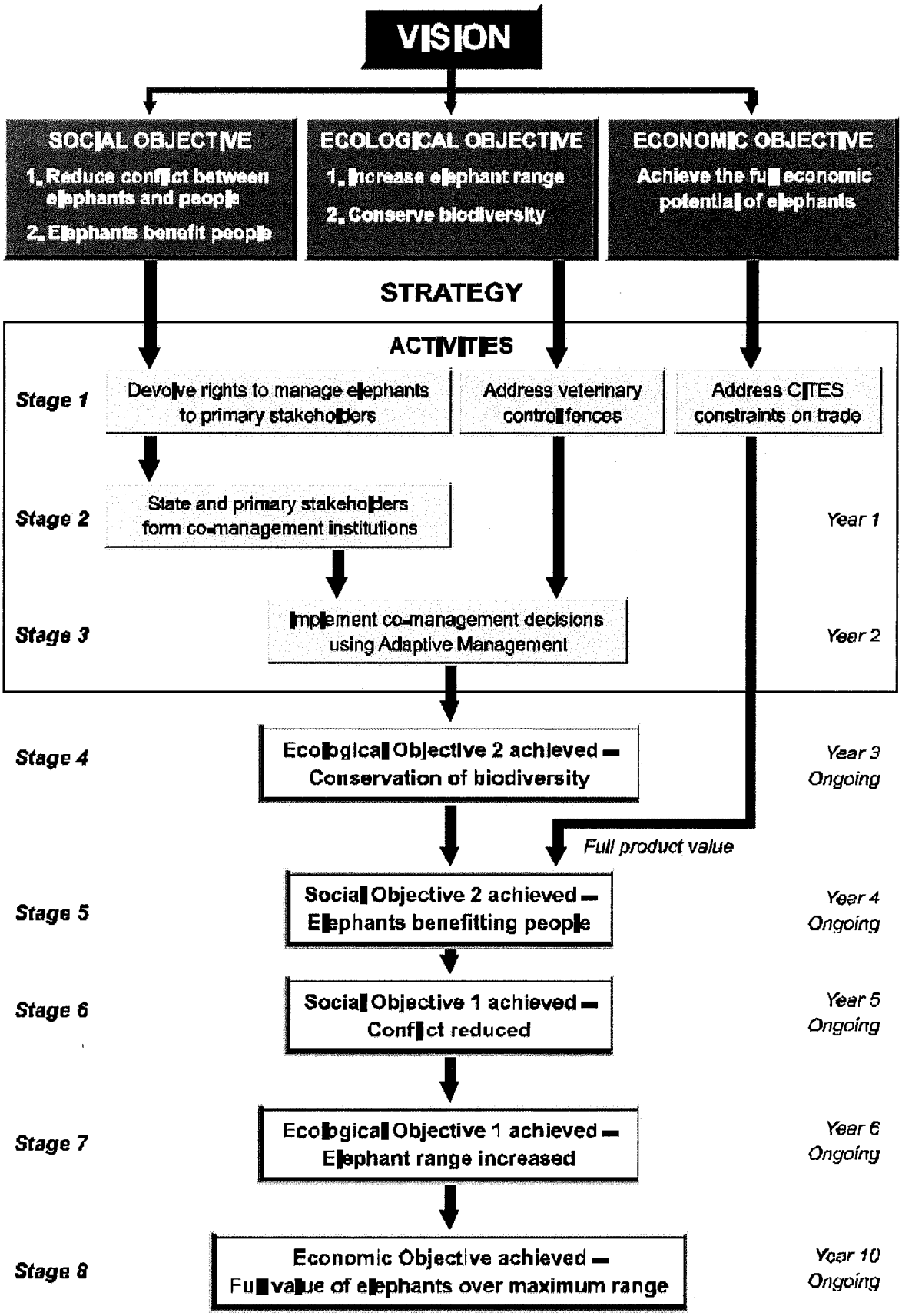

Fig. 2: Strategy for Management of the Namibian Elephant Population

INTRODUCTION & BACKGROUND

This Species Management Plan should be read in conjunction with the Background Study for Elephants prepared under the Transboundary Mammal Project of the Ministry of Environment and Tourism (MET) in April 2005.

Conservation Status and Significance

The taxonomy of Macdonald (2001) places the Savanna Elephant *Loxodonta africana* in the Family ELEPHANTIDAE, the only family in the Order PROBOSCIDEA (mammals with trunks) which is one of three Orders in the Superorder SUBUNGULATA (elephants, dugongs and hyraxes) which is part of the Infraclass EUTHERIA (placental mammals) in the Subclass THERIA (mammals bearing live young) in the Class MAMMALIA (mammals).

In the IUCN Red Data Book (Hilton-Taylor 2000), the species is classified as *Endangered*. This classification is based less on the actual numbers of elephant and more on the fact that the population is fragmented and has suffered recent catastrophic declines in some countries.

The African elephant was listed on Appendix I of CITES[1] at the 7th Meeting of the Conference of the Parties held in Lausanne in 1989. At the 10th CITES meeting in Harare in 1997 the elephant populations of Botswana, Namibia and Zimbabwe were transferred to Appendix II which, in theory, enables these countries to trade in ivory and elephant products. In practice, numerous obstacles have been placed in the way of trade – "*the Conference of the Parties has . . . adopted increasingly complex requirements for trade in elephant products that have all but ensured that such trade does not take place*" (MET 2004).

The distribution of elephants in southern Africa is shown in **Map 1**. It is emphasized that the elephant range shown on the map is no more than a 'snapshot' in time. The rapid expansions that are taking place in elephant populations in southern Africa, particularly in and around the Caprivi, will make any map outdated within a year. In 2002, the population in the whole of Africa was estimated at 560,904 elephants (African Elephant Database, AfrESG 2002).[2] More than half of this population is in southern Africa[3] and more than half of this is in Botswana (DG 2004). Projecting at normal population growth rates, the elephant population in southern Africa is likely to be around 350,000 to 400,000 animals in 2007. It is clear that elephants are not threatened in southern Africa and this raises the question whether they can be validly classified as threatened at the continental level.

The conservation status of elephants in Namibia is more than satisfactory – their numbers already exceed what many would consider desirable for the available habitats. Indeed, Namibia might want to avoid habitat changes of the sort that have happened in large parts of the elephant range in northern Botswana as a result of an overabundance of elephants (DG 2004, p7). In all other species management plans prepared thus far concerning ungulate species of the north-east, elephants have been identified as a possible threat to other species.

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[1] Convention on International Trade in Endangered Species of Wild Fauna and Flora

[2] "Definite" – 402,067; "Probable" – 59,024; "Possible" – 99,813

[3] "Definite" – 246,592; "Probable" – 23,722; "Possible" – 26,098; Total – 296,412

The economic contribution which elephant could make to the wildlife industry and to land use values in northern Namibia is very high, especially if the present elephant range can be consolidated and expanded southwards in the central area between the north-western and north-eastern populations. For non-hunting tourism, this contribution would come more from expanding the elephant range than from increasing numbers in the present range.

Under a high quality trophy hunting regime, elephants could bring in a net income of about US$120,000 for every 1,000 animals in the population. In the north-east of the country where elephant densities are reaching a level of 1/km^2, the net financial return should be of the order of US$1.20/ha (N$7.50/ha). When added to the present net returns from existing wildlife management without elephant hunting, this could result in a doubling of income. The present levels of exploitation of elephant for sport hunting on communal land in the Caprivi, eastern Kavango and Otjozondjupa regions (NNF 2004) are well below sustainable off-take levels and could be significantly increased for the benefit of local people.

In economic terms, the 'net value added' to land use values by the inclusion of sport hunting on commercial farms in the north of Namibia is, in all cases, more than double the value of the cash income (Barnes & de Jager 1995) and this relationship should hold true for the enhanced income obtained by adding elephants to the species mix.

Were the Ministry to combine elephant sport hunting with the reduction of elephant populations through culling in the State protected areas in the north-east of the country (a total of 14,000km^2 including the Caprivi Forest Reserve), the expected income would be some N$13 million which would meet the present costs of maintaining and managing these areas. If a similar management regime were practised by the conservancies in the north-east, the increase in income would also be substantial and should more than offset the costs which elephant are presently causing through crop raiding and other damage.

Elephants are classified as *Specially Protected Game* under Namibian law (Schedule 3, Nature Conservation Ordinance, Order No.4 of 1975). The original justification for such a listing may well have disappeared. However, designating the species as *Protected Game* (Schedule 4) or as *Huntable Game* (Schedule 5) or as a *Problem Animal* (in terms of Section 53(1)) would not introduce any greater flexibility in the management of the species as long as the provisions of section 37 (hunting of game to protect grazing, cultivated lands and gardens) expressly exclude elephants from being hunted either by private landholders (subsection 37(1)(a)(i)) or communal lands residents (subsection 37(1)(a)(ii)) in defence of their own livelihoods. To achieve the objectives of this Management Plan, several revisions to the legal provisions for elephants under Namibian legislation would be desirable.

Populations

Elephants occur across the entire north of Namibia (**Map 2**) with two main subpopulations in the north-east and the north-west. The subpopulations are not genetically isolated since they are weakly linked through the 'occasional' range in the central area which includes a small resident population of about 20 animals in the Mangetti.

The north-western range appears to be expanding at present. Elephants are being seen as far south as the Ugab River and in all of the river catchments which flow westwards to

the Atlantic Ocean in the north. As yet, the extreme north-western part of the potential range along the Kunene River has not been re-colonised although elephants were present in this area up until 1990.

Estimates of numbers are shown in the table below. In 2004 the total population was estimated at over 16,000 animals and, allowing for underestimates on aerial surveys, the true number in 2005 is likely to be closer to 20,000. The north-western population appears to be growing at about 3.3% per annum and there are movements of elephants in and out of Etosha National Park. The recent increases in the north-eastern population are well in excess of normal growth rates (which are less than 5% per annum) and must be attributed to migration from the northern Botswana population (about 150,000 elephants) and the north-western Zimbabwe population of about 50,000 elephants. The huge number of elephants south of the Caprivi presents Namibia with a management challenge.

Estimates of elephant numbers in Namibia

	NORTH-WEST		**NORTH-EAST**	
	Etosha National Park	Kunene and Erongo regions	Khaudum & Nyae Nyae	Caprivi East & West
Aerial surveys began in	1966	1968	1977	1978
Highest estimate	*2,800*	*800*	*4,815*	*8,726*
Year	*(1983)*	*(2004)*	*(2004)*	*(2004)*
2004 Estimates	2,057	800	4,815	8,726
Subpopulation Totals	**2,857**			**13,541**
2005 Projection	2,656	1,033	5,658	10,268
Rounded to nearest hundred	2,700	1,000	5,700	10,200
Subpopulation Totals	**3,700**			**15,900**
Total population projected for 2005		**20,000**		*rounded to nearest thousand*

Notes:

The numbers given for 2004 are aerial survey estimates except for the Kunene and Erongo regions which are based on estimates by Loutit and Leggitt.

The 2005 projections for the North-west are based on a population growth rate of 3.3% and a correction factor of 25% for undercounting.

The 2005 projections for the North-east are based on population models (see *Background Study*) which include a correction factor of 25% for undercounting.

In addition to the numbers shown, an additional 76 elephants are on private land in northern Namibia.

Limiting Factors and Threats

At present no factor is preventing an increase in numbers of elephants in Namibia. Elephant populations might increase faster with the addition of more water points[4], with the removal of veterinary fences[5] or with less competition from cattle[6] but, even with these constraints, the information presented in the *Background Study* suggests that elephant are increasing at the maximum possible rate.

In both the north-western and north-eastern subpopulations, conflicts with humans are escalating due to the increase in elephant and human population numbers. In the extreme north-west, these conflicts are relatively minor because human populations are sparse and few crops are grown, although this may not be true for the Cuvelai area north of Etosha. In the north-east, crop damage incidents are a major problem.[7]

The benefits which communities are receiving from elephants on their land are small. The number of elephants hunted as trophies and problem animals is low and does not come close to compensating communities or individuals for their losses. Farmers are not free to defend their livelihoods from elephant depredations and the current arrangements for control of problem elephants are too tardy to be effective. O'Connell (1995) found an extremely hostile attitude towards wildlife among the Caprivi peoples and the inception of conservancy projects did little to ameliorate this attitude. With all conservancies being in a fledgling stage, there is a 'wait-and-see' attitude among their members. The recent rapid increase in the numbers of elephant in the Caprivi may be due to a temporary tolerance of elephants while conservancies are in their formative stage. The situation is finely balanced and it would require little in the way of disincentives for the entire edifice to collapse. A potential threat to elephants is the inception of a wave of illegal hunting by dissatisfied people.

The factors which should influence decision-taking and the options, difficulties and possible solutions to elephant management in Namibia are shown in a simplified diagram (**Fig.1**). In the north-west of Namibia elephant populations have considerable latitude for increasing their range and the situation may not require management interventions for many years. However, in the north-east, the escalating levels of conflict between humans and elephants suggest that the time for action has already been reached. Initially, the problem in the north-east appears intractable: the Caprivi, Khaudum and Nyae Nyae areas lie on the periphery of the largest elephant population in Africa. Management interventions carried out in isolation in Namibia will not affect the core elephant populations from whence the problems emanate.

Perhaps a shift in thinking is needed away from narrow preoccupations with biological diversity to a fuller consideration of the opportunities presented by the current situation. In the previous section, the exodus of elephants from Botswana and north-western Zimbabwe was portrayed as a challenge rather than a problem.

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[4]For example, in the multiple use zone of Bwabwata.

[5]For example, removal of the international boundary fence along the southern boundary of Bwabwata and along the eastern boundary of Khaudum and Nyae Nyae would greatly facilitate east-west linkages in the regional elephant range.

[6]In a study of the Caprivi Region, Schlettwein (*et al.* 1991) saw the greatest threat to large wild herbivores as the extreme grazing pressure exerted by 96,000 head of cattle – a number which the authors expected to rise to 260,000 by 2000.

[7]In 2003 there were 253 separate incidents involving elephants in the Caprivi and 985 recorded instances of crop damage.

The importance of creating conditions which allow wildlife to compete with domestic livestock as a form of land use is referred to in several places in the *Background Study* and it might be salutary to consider how cattle farmers would react to the present situation if the focus were on cattle and not elephants. If, within the midst of a group of cattle farms, one farmer produced an overabundance of cattle to the extent that the beasts moved onto adjacent properties and, if that farmer made no effort to recover his cattle and was not overly concerned about his neighbours making use of the plentiful resource, the normal human reaction would be to accept the bonanza and use it. It is proposed that exactly this attitude should be adopted by the Namibian authorities towards the elephants in the north-east. Namibia should take full advantage of the opportunity presented by the overflow of elephants from the large and thus far unmanaged elephant populations of Botswana and Zimbabwe. The justification is that elephants are causing significant hardships for people and threatening conservation objectives in the north-east.

Namibia's short-term problem is to accommodate the increase in elephants, which is currently happening. Elephants have a propensity to eat themselves (and other species) out of house and home no matter how great the range available to them – a process which culminates in population crashes. In the long term, population reductions may be necessary. In the north-west, the management requirement may simply be to increase the range available to elephants: in north-central and north-eastern Namibia not only does the range need to be increased but, in some areas, the population may need to be reduced (**Fig.1**).

Technically, there are no good reasons why more land in Namibia should not be made available to elephants. The highest valued land uses over most of this arid country (**Map 3**) are those based on management of natural resources (Brown 2004). Moreover, the full potential is far from being realized at present due to national and international policy constraints, which place wildlife at a competitive disadvantage with land use based on exotic species. Were subsidies to be removed from the domestic livestock industry and, were it possible for elephant to play their full economic role in land use systems, it could reasonably be expected that large additional areas of land would be converted to wildlife management where human densities are relatively low and where co-existence with elephants is possible, as elsewhere in Namibia – for example, in most of the northern Kavango, parts of the central northern regions and in eastern Caprivi. This would remove the short-term limiting factor of providing additional range for elephant.

The technical arguments for greater areas of Namibia to be put over to natural resource management will not, on their own, bring about the needed changes to remove this limiting factor for elephants. It will require a high level of political commitment and the correct suite of incentives to induce landholders (both communal and private) to convert to a land use based primarily on wildlife. The high- level political commitment is already in place. In a speech delivered on 3rd February 2004, His Excellency the Founding President, Dr Sam Nujoma, made the visionary statement that wildlife would be restored throughout the north of Namibia, that ownership of wildlife would be conferred on local peoples and that the economy would be transformed by diversification based on wildlife uses.

For elephants, two factors mitigate against realizing the President's vision. The first is that the full value of elephant commodities (ivory and elephant skin) cannot be realized

due to international trading constraints.[8] The second is that elephants in Namibia are effectively State property – which was clearly not the President's intent. These two major disincentives need to be addressed before the conditions for increasing elephant range will be achieved. The options for tackling the CITES constraints are discussed fully in section 2c of the *Background Study* and briefly under the *Strategy and Actions* in this plan. The devolutionary requirements for elephants are also dealt with under the *Strategy and Actions*. A threat to fulfilling the Vision lies in a possible perversion of the intent of policy during the course of putting it into practice (Corbett & Jones 2000).

Full devolution of rights over elephants to landholders (on both communal and private land) is a prerequisite for creating the correct suite of incentives for elephant populations to expand. It is a necessary but not a sufficient condition. As a result of the arid environment in Namibia, elephant have large home ranges and this has major portents for management, both within Namibia and across national boundaries. No single protected area is a self-contained range for elephants and, in the north-east, the national parks in Caprivi are small (e.g. Mahango, Mamili and Mudumu) and very much at the mercy of the land use surrounding them. The desirability of cooperation with conservancies and surrounding communal lands has been emphasized in all of the previous studies in this series.[9] A key difference between the institutions needed for elephant management in the Caprivi and those in the north-west is that they would have to include stakeholders who are not included in conservancies. Unlike the other species in Caprivi for which management plans have been prepared, elephant are not rare or endangered and, indeed, they are a threat to those species which are.

A process of 'scaling up' is necessary to match institutions with ecological imperatives (Murphree 2000). Large areas co-managed by the relevant landholders and occupiers will be necessary to provide viable ranges, to distribute the pressure of elephants on habitats and to allow population increase and expansion. The Vision Statement developed under the UNDP/GEF-assisted project in Namibia (UNDP 2005) provides for co-operation between stakeholders to achieve this far-sighted concept. Linkages would be established under a co-management system which would both secure and increase the available range for elephant (**Map 4**).

In the north-east, elephant population reduction may be necessary. However, there are no simple answers to the question of how many elephants need to be removed – either to conserve biological diversity or to reduce conflicts between humans and elephants. It would be a mistake to attempt to hold the elephant population of the north-east at some constant level (or, conversely, to attempt to maintain a constant harvest from it). Such a "Command-and-control" approach (Holling & Meffe 1996) is likely to have adverse effects on the resilience of ecosystems.

This all points towards a need for imaginative and innovative management. An acceptance is necessary that there are no scientific recipes which avoid all the pitfalls in what is a 'complex system'. The starting premise may be that the option of zero use is

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[8]Elephant are perhaps the only species where, if markets were working properly, the commodity value of an elephant bull is actually higher than the value which can be realized from trophy hunting.

[9]Martin (2004) stated that successful conservation of the wetland grazers was unlikely to be achieved without co-management institutions for the full extent of the floodplain habitats in the Caprivi.

not a reality – elephants will be harvested illegally and unsustainably if facile attempts are made to debar their use. The aim should be to avoid routine cropping or culling programmes which attempt to impose constancy on naturally fluctuating ecosystems and to introduce an element of randomness into the system. The challenge is to make it sustainable and this requires an adaptive management approach (Holling 1976).

Combining adaptive management with the arguments for co-management presents a classic situation where the principles of adaptive co-management in complex bio-economic systems (Ruitenbeek & Cartier 2001) need to be applied. The individuals who are most affected by elephants are those living in the north-east: together with the State authorities, they should decide how elephants should be managed.

Background and Rationale for the Management Plan

The African elephant has achieved huge prominence in global conservation issues in the past 20 years. Few other species are capable of arousing emotions, polarizing viewpoints and causing controversy to the extent that *Loxodonta africana* has done. In 1989, rightly or wrongly, the species was listed on Appendix I of CITES and legal trade in ivory was effectively banned. Because of the high profile of the species, every range country seeking credibility in the international conservation arena should have a management plan for elephant.

The southern African region holds more than half of the African elephant population and the largest concentrations of elephant are in a central zone extending across the continent between latitudes 15º-20º south of the equator. Within this zone, Botswana and north-western Zimbabwe hold some 200,000 elephants. The expansion of these populations into neighbouring countries is affecting biological diversity and human livelihoods. In recent years, divided opinions on the subject of elephant management have characterized debate in southern Africa and the situation is no less contentious than in the international arena. The topic is now in the political realm and demands for elephant management plans are coming from all stakeholders.

The 'elephant problem' is central in initiatives to create transboundary conservation areas in the region. The need for elephants to have access to far larger areas than those in which they are currently confined is recognized and, for many, TFCAs are seen as the solution to elephant population increases. Unfortunately, a lack of coherent land use planning in all of the participating countries[10] in the KAZA TFCA, coupled with a legacy of national boundaries which are an "outrage to geography and all common sense", (Fisch 1999) means that this TFCA will undergo a long and difficult birth. And shortly after parturition, the 'elephant problem' will rear its ugly head notwithstanding the additional range which is available. National management plans are needed to anticipate the reality that TFCAs will not solve the elephant problem.

Under the present Namibian environmental legislation, management plans are required for species which are rare or valuable and which share boundaries with neighbouring countries. Elephants are not rare but they are potentially valuable and, within multi-species wildlife systems, could provide a financial return which greatly exceeds that possible from alternative land uses. A management plan which treats elephants as the

[10]Angola, Botswana, Namibia, Zambia and Zimbabwe.

valuable resource that they are could generate sufficient income to meet the conservation costs of the elephant range in Namibia.

This plan has no relationship to standard Government five-year budgeting plans – except insofar as the required operational expenditure for State Protected Areas needs to be maintained continuously above the minimum threshold needed for effective management and law enforcement. The achievement of a greater range for elephant and the capacity to carry greater numbers of elephant is subject to many factors being favourable – including success in conservancy development, a reversal of the present spread of unplanned settlement and land clearance, mitigation of the effects of veterinary fences and the creation of institutions with local stakeholders that allow co-management of elephant populations over substantial areas.

Plan Structure

In each of the preceding species management plans under the Transboundary Mammal Project, it has been found necessary to make minor adjustments to the *pro forma* layout that formed part of the terms of reference. Some additional small changes have been made in this plan – to suit the specific requirements for the species.

The style of the plan differs slightly from previous plans. Throughout the text, there is more narrative discussion and less of the conventional 'bullet point' approach. Recognizing that any decisions to manage elephant are potentially controversial, the plan gives due weight to the concepts and philosophy on which management should be based. The plan advocates that elephant management decisions are made in a co-management forum with other primary stakeholders and, because of this, it is impossible to predict in advance what those decisions will be or to spell them out in a concise sequence of required activities. The emphasis is more on predicting the outcomes of certain actions rather than advocating particular management interventions.

(1) The plan begins with a **VISION STATEMENT** which incorporates a **GOAL** and three objectives – a **SOCIAL OBJECTIVE**, an **ECOLOGICAL OBJECTIVE** and an **ECONOMIC OBJECTIVE.** The Vision builds on evolving Namibian policy.

(2) A set of **ACTIONS** needed to achieve the objectives follows and, taken together, these actions comprise the **STRATEGY**. The points are made that complex interactions exist among the objectives that are not amenable to 'linear programming' and an **ADAPTIVE MANAGEMENT** approach is needed for all interventions.

(3) The **RISKS AND ASSUMPTIONS** implicit in the plan are then detailed – the most severe risk being that attached to doing nothing.

(4) **FINANCE AND CAPACITY**: In previous plans detailed budgets have been prepared for implementation – based on the assumption that the plan might be submitted for donor funding. This plan is unique in that the income from elephants should more than meet all implementation costs and it is recommended that the plan is not submitted to donors. An estimate of typical income from elephant management is presented in **Appendix 1**.

(5) The key issues on which **TRANSBOUNDARY COOPERATION** is desirable are highlighted, and it is noted that the principles on which this management plan is based could be extrapolated to the larger scale of a trans-frontier conservation area.

MANAGEMENT PLAN

VISION, GOAL AND OBJECTIVES

This Vision Statement consists of a preambular section and an operative section in which the overall goal and objectives are stated. Following the Vision Statement, a sequence of actions is presented which, taken together, comprise a strategy to achieve the objectives.

This is the Vision Statement of the MET and not necessarily that of the other primary stakeholders in Namibia – who are those people in communal lands and on private land where elephants occur. For this reason some care has gone into the phrasing of the Vision Statement so that the State does not appear to speak on behalf of the other stakeholders with whom it hopes to enter into co-management arrangements. The overall goal makes it clear that the Ministry will be guided by the wishes of the other stakeholders.

If it were adopted, this Vision Statement could be seen as Government's policy for elephants. Several points need to be made: –

(1) Notwithstanding any sensitivity to other stakeholders, it is completely valid for Government to state its policy. The assumption is that the policy is already informed by the wishes of the stakeholders.

(2) Policy is a statement of Government's intent and, as such, it should be focused on the larger issues and not burdened with details.

(3) Policy precedes legislation. Laws are made to give effect to policy.

(4) Policy is essentially experimental and, at the outset, there should be an awareness and acceptance that it may need to be changed. Implementation of policy is 'adaptive management' at the highest level (Lee 1993).

VISION

RECOGNIZING that elephants are of global, regional and national conservation concern;

CO-OPERATING with neighbouring countries and the international community to achieve the security of the species and enhance its biological status;

PARTICIPATING fully in transboundary initiatives which, *inter alia*, will extend the range available to elephants;

REGARDING the elephant as a highly desirable species to be conserved as part of the biological diversity and natural wealth of Namibia and noting that there are unique adaptations among Namibian elephants to arid environments;

RECORDING the fact that Namibia has a secure and viable population of elephants which is expanding at the moment and becoming overabundant in some areas;

WILLING to continue to commit public funds to the promotion, protection and management of the species;

BEING AWARE that in recent historic times elephants were found throughout Namibia but that to return to this situation will require a high economic value to be attached to the species;

PROMOTING wildlife management as the optimum land use in the arid environment of Namibia and treating elephants as one of many valuable species in the diverse large mammal community occurring in Namibia;

NOTING the potential financial and economic contribution that elephants could make as part of wildlife-based land use were it not for national and international policy constraints;

DRAWING ATTENTION TO the high costs entailed in conserving the species that include the damage that elephants inflict on human livelihoods and the reduction in biological diversity that results from an overabundance of elephants;

EMPHASISING that a policy of total protection for elephant will result in their available range being reduced to State protected areas and a corresponding decrease in their numbers;

CONVINCED that a policy of sustainable use, as enshrined in the Namibian constitution, will result in the expansion of the range available to elephant and an increase in their numbers;

Accordingly, the Ministry has the following goal and objectives –

STRATEGY AND ACTIONS

Simple as the objectives are, they will not be achieved by 'linear programming' within each objective. To achieve the ecological objective of increasing elephant range requires certain actions to be taken in the social and economic categories. The social objectives of reducing conflict and achieving a flow of benefits require actions to be taken in the ecological and economic realms. The full economic objective will not be achieved until all of the other objectives are in place.

While all the actions and outcomes appear to be inextricably linked, it is possible to present them in a sequence which leads logically to the achievement of the objectives.

GOAL

Namibia wishes to carry the maximum number of elephants that is consistent with the conservation of biological diversity AND the wishes of those primary stakeholders who have elephants on their land

SOCIAL OBJECTIVE

1. **To reduce conflict between elephants and people**
2. **To create conditions under which elephants are a benefit to people**

ECOLOGICAL OBJECTIVE

1. **To increase the range available to elephant**
2. **To conserve biological diversity in State Protected Areas and promote the conservation of habitats outside State Protected Areas in the elephant range**

ECONOMIC OBJECTIVE

To enable the full economic potential of elephants to be realized according to the provisions for sustainable use in Namibia's Constitution

The actions, when taken together, comprise a strategy and this is outlined below as shown in **Fig.2**.

A feature of this management plan is just how few actions are needed to bring it to fruition. Success relies on a few administrative masterstrokes which will cost next to nothing – rather than on a long list of expensive management activities.

(1) **Devolution**

Devolution of authority for landholders, both communal and private, to manage elephants on their land is a prerequisite for the other stages in the management plan. Co-management arrangements cannot be entered into as long as the stakeholders around the table (other than the State) have no rights over the species. It will be impossible to create the conditions under which the elephant range can expand without the correct suite of incentives – which includes full empowerment at the outset. The State does not have the answers as to how many elephants there should be in all the parts of the range (and there may be no right or wrong answers) and it needs the other stakeholders to help to decide this.

Many planners and bureaucrats see devolution of authority as a step-by-step process where communities are granted powers incrementally as they demonstrate the ability to manage. This is a 'Catch 22' situation (Murphree 2000). Authority is a prerequisite for responsible management and should not be held out as the reward for it. In some cases, State authorities cannot see why the end goals of wildlife management require complete devolution. Devolution carries with it the responsibility for organization, management, control, self-sufficiency and, above all, for developing resourcefulness. These attributes cannot be imposed. They must be developed experimentally in the local setting and, without authority, such experiments are defective. The stimulus for the development sought within this management plan will arise not from the anticipation of future entitlement but from the imperative of immediate empowerment.

The MET may fear that complete devolution of authority for elephants could have wider ramifications – establishing precedents that would affect all other large mammal species in Namibia. This need not necessarily be the case. The devolution could be clearly labelled as 'experimental' and justified by the current prominence and urgency of elephant issues. In any case, the Ministry hopes that shortly after devolving these rights, it can enter into co-management arrangements in different parts of the elephant range – this will probably result in stronger controls on elephant exploitation than could be implemented by the State on its own.

In Zimbabwe during the 1970s and 1980s, wildlife authority was almost totally devolved to landholders except for Specially Protected Species (a legal category of wildlife where the State retains powers to control exploitation). Elephants in Namibia are in such a category. It is of interest that, in the years after devolution, all wildlife species increased in abundance except for Specially Protected Species. By limiting the rights of landholders to hunt, crop, breed, capture, translocate and sell these protected species, the incentives were not present to bring about their increase. Elephants are abundant in Namibia and there is no sound conservation reason why they should be classified as specially protected. Perhaps the only legal control that needs to be maintained is that of ensuring that all ivory is sold through the central Government outlet in order to satisfy CITES accountability requirements.

(2) **Veterinary control fences**

The influence of veterinary fences on the current elephant range, both in Namibia and in the region, is profound. There is a bottleneck in the vicinity of Mahango Core Area within Bwabwata National Park that affects the entire regional range for elephant across the central southern African region, (**Map 5**) caused by the veterinary fences on the southern boundary of Caprivi and along the international border between Botswana and Namibia. The compression of elephants in this narrow isthmus has undoubtedly been responsible for the woodland destruction in Mahango. This is a matter for the MET to pursue from the outset of the management plan.

The recent migration of elephant into Namibia indicates that these fences are less than effective. The boundary fence between Khaudum and Botswana is frequently breached over a large section (Beytell *pers. comm.*) and the fence on Caprivi's southern boundary is in a similar state (Booth *pers. comm.*). However, there should be little cause for elation over this: the fences undoubtedly impede movement of elephants up and down the Kavango River and act against the maintenance of spatial linkages between the subpopulations. There is a danger that the authorities in both countries will suddenly become conscious of the *status quo*, attempt to repair the fences and, at the same time, demand that elephants are killed as problem animals.

Cumming (2005) has called for the veterinary profession to re-examine its methods of disease control as the southern African region moves into transboundary wildlife management over very large areas. Methods of control that were developed in the 1960s and applied at national levels may no longer be appropriate at the international scale where collaborative efforts are being made between governments to move to the higher-valued land uses offered by wildlife tourism.

(3) **Constraints on trade**

CITES constraints on trade in ivory and elephant products are exerting a negative effect on Namibia's aspirations for conservation of elephant and, more generally, acting as a disincentive to the adoption of wildlife management as a primary form of land use.

The listing of the Namibian elephant population on Appendix II of CITES is accompanied by an annotation which makes trade in ivory and other elephant products very difficult. The achievement of full market prices for elephant commodities is needed to realize the ultimate objectives of this management plan. For this reason, the removal of the particular constraints affecting Namibia should be tackled with renewed vigour by the Government at an early stage in the inception of the management plan.

The options open to Namibia to achieve the removal of the current CITES annotation limiting its ability to trade are discussed in the *Background Study* and it may not be strategic to present them here. One of the options is to accept the *status quo*. The perspectives included in Namibia's submission to the 13th CITES meeting in Bangkok in 2004 to amend the annotation affecting Namibian elephants (MET 2004) are extremely powerful and provide the justification for rejecting this option. Namibia has reiterated its determination to oppose measures imposed externally that act detrimentally towards conservation, local people and national development.

It cannot be denied, however, that there are substantial values to be derived from elephants through tourism and international trophy hunting (which is not debarred under the Namibian annotation) even if they fall short of the ideal. The management plan is worth pursuing, even if the full value of elephant products cannot be achieved overnight and even if performance under the Economic Objective is lower than it should be.

(4) **Co-management**

Namibia continues to make huge progress in the development of conservancies on communal land. Namibia currently has 50 registered and about 20 emerging conservancies, with 220,620 people living in registered conservancies managing wildlife over an area of more than 118,704 km^2, including expanding elephant populations. The wildlife range on commercial farmland in the north of the country is increasing – particularly in areas where it is hoped that the elephant range can be expanded. These very positive developments are recognized in the Vision Statement of UNDP (2005) and are seen as a way to link protected areas across the country and to provide a continuous range for elephants across the north of Namibia.

It is important that the momentum continues: further evolution of policy is needed to allow new co-management institutions for larger areas to emerge. The present mosaic of parks, conservancies and commercial farms provides a sound and essential foundation for the 'scaling up' of institutions (Murphree 2000) and, as they stand, partnerships can be entered into among neighbours. But there is a difference between partnerships and full co-management institutions. The needs of elephant provide the vehicle for co-management – no tract of land in Namibia is large enough to be a self-contained management unit for elephant.

Ruitenbeek & Cartier (2001) would have it that a co-management institution cannot simply 'be imposed on a group of innocent bystanders'. It is something that should emerge naturally from a complex bio-economic system. The devolution of rights over elephants creates the conditions for emergence – it should stimulate the formation of institutions based sensibly on geographic areas. Here, too, there is scope for applying another principle – *no institution should be larger than the problem it is trying to solve* (Martin 1999b). Each new co-management institution should be related to the range of an elephant subpopulation and should include only those stakeholders on whose land elephants occur (which would include, in some areas, communal residents who are not organized into conservancies). The high-level institutional structure proposed for the State wildlife agency under the MET/UNDP/GEF project (UNDP 2005) is ideally suited to this from a geographical perspective. The new divisions, subdivisions and sections are well-matched to the elephant ranges that will require co-management institutions.

The State will be part of each co-management institution formed to manage elephants but its new role should be very different from a 'command-and-control' function. The operating point on the management continuum defined by Ruitenbeek & Cartier (2001) should be close to the *laissez faire* end of the spectrum.

At an early stage in the formation of the co-management institutions, a voting procedure may need to be established that could be based on the size of the landholding for which each stakeholder is the responsible authority within the elephant range. On this basis, the State might dominate decision-taking in the north-west: in eastern Caprivi, where Mudumu and Mamili national parks are relatively small, the communal land stakeholders should have the major say.

(5) **Adaptive management**

At this stage management interventions required in north-western Namibia are minimal: elephant densities are low and the population is in the process of re-colonizing its former range. Perhaps the only agenda for a co-management institution would be the allocation of trophy quotas.

In north-eastern Namibia, the migration of large numbers of elephant from Botswana, habitat modification in national parks and escalating levels of conflict between humans and elephants may require significant management interventions. The co-management institutions[11] in the north-east would need to address trophy hunting quotas, problem animal control (PAC) and population reductions.

Trophy hunting

In the absence of any other management (including PAC), the proportion of an elephant population that can be hunted for trophies is about 0.5%. These trophies would all be males over 30 years old. If the north-eastern population is about 16,000 animals, the maximum trophy quota would be about 80 animals of which 50 would come from the Caprivi and 30 from the Khaudum/Nyae Nyae area.

These might be the quotas set from 2007 onwards. Under adaptive management, the ages of the elephants killed should be monitored and, in succeeding years, the quotas should be adjusted upwards or downwards according to the criterion that there should be some animals among those killed that have reached an age of 40 years. If monitoring were based on tusk weights (which is considerably easier), there should be several tusks greater than 22 kg in the quota and the average tusk weight should not be much less than 19 kg.

Under a co-management system, it would not be necessary to allocate hunting quotas to particular conservancies or protected areas. The total income from all the trophies could be shared according to landholdings (or other agreed criteria) at the end of the year.

The sustainable off-take of trophy hunting quotas is affected by any other management interventions taking place at the same time (PAC and culling) and the effects are discussed below.

Problem animal control (PAC)

If PAC is restricted mostly to male elephants 15 years and older, the maximum sustainable off-take is about 1.5% of the total population. As the problem animal off-take is increased, the trophy hunting quota must be reduced to remain sustainable and, when the level of PAC reaches 1.5%, there are insufficient animals reaching an age of 30 years to allow sport hunting. The relationship is shown in the table below.

PAC off-take %	0	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	1	1.1	1.2	1.3	1.4
Trophy off-take %	0.50	0.45	0.40	0.36	0.32	0.26	0.22	0.18	0.12	0.11	0.08	0.05	0.03	0.02	0.01

Percentage off-takes are of the total population

The present system for dealing with problem elephants is clearly unworkable, particularly in the Caprivi. Elephants identified as problem animals must first be offered to a hunting concessionaire. The professional hunter is not allowed to shoot after dark which means that on most occasions the offending animal will not be killed in the act of crop raiding. If the hunter is unsuccessful in selling the animal as a trophy to a hunting client, MET staff

[11]There would probably be three such institutions in eastern Caprivi and Kavango.

may then destroy the animal subject to the current delegations of authority by the Minister.

Under a fully devolved co-management system, each stakeholder might be responsible for PAC in his/her landholding or authorized control officers would be present as needed in different parts of the area.[12] Being aware of the impact of PAC on trophy hunting, the co-management committee might prescribe guidelines to minimize the number of animals killed.[13]

Population reduction

Culling entails the removal of entire elephant herds with the aim of reducing population numbers or limiting the rate of population increase. By removing entire herds, the age structure of the female segment of the age pyramid remains unaltered and no selective pressures arise from the practice. The overall age structure of the population does become skewed in favour of males and this permits a higher percentage quota for trophy hunting, although it does not result in a greater number of male trophies over a period of years than would be obtained from a population which is not subjected to culling (because of population growth).

For a population growing at 4.6% per annum (a typical growth rate for savanna elephant), **an off-take of 3% of the total population will stabilise numbers**: a higher percentage off-take will reduce the population. This entails an off-take of about 30 animals for every 1,000 animals in the population. If culling is combined with trophy hunting, quotas can be raised to 1% of the population and an additional 10 males over the age of 30 years would also be removed annually.

If the sole consideration of the MET was to limit vegetation damage inside national parks, it might not seem necessary to confer with other stakeholders on any management decision to reduce elephant numbers in State protected areas. However, given the movements in and out of parks, a more sensible strategy is to manage the population both inside and outside parks with the other stakeholders for multiple objectives.

There are no simple prescriptions for the 'correct elephant densities' either to conserve biological diversity or reduce levels of human/elephant conflict. The worst mistake that could be made would be to attempt to hold the elephant population of the north-east at some constant level or to attempt to maintain a constant harvest from it – because this has adverse effects on ecosystem resilience. The rational approach is adaptive management (Holling 1976). Learning will only occur by exploiting the resource (Hilborn & Ludwig 1993) and monitoring progress towards the desired situation. By joining with

[12]In the late 1960s and early 1970s a PAC system which was in place in Caprivi where Chiefs Mamili and Liswani III (Salambala) had their own hunters authorised to hunt problem animals and obtain meat for feasts. These hunters were armed with .458 and .375 rifles. A quota was issued to each chief, problem animals were reported and dealt with within 24 hours, the tusks from the problem animal were registered, sold on the chiefs' behalf and the funds were deposited into the chiefs' account for community development. The system worked well (B. Beytell, *pers. comm.*).

[13]If commodity markets for elephant products were functioning properly, there would be little financial advantage in selling an elephant as a sport hunting trophy – the same animal would earn as much killed as a problem animal.

other stakeholders in deciding the nature and extent of any management interventions, the MET will place itself in a strong political position both nationally and internationally. The implementation of any population reductions will not be difficult to defend since the decisions will have been taken democratically.

Cropping

Namibia has stated firmly in its submissions to CITES (MET 2004) that no elephant will be killed for the sole purpose of realizing its value in the ivory trade.

Throughout Africa, elephants have been killed by local peoples for both ivory and meat for centuries. One of the primary reasons that colonial powers sought territories in Africa was because of the natural wealth of ivory (Parker 2004). Ansell (1960, page 50) remarks on the damage to crops in the Luangwa Valley, Zambia, but notes that elephant were seen by local people as valuable animals because of the meat they provided.[14]

It would be as well for MET to enter any co-management forum with no preconceived moral position on elephant. Having accepted that the solutions to the current 'elephant problem' may lie in innovative management inspired by the values of local people, a *tabula rasa* is needed to accept with an open mind all options presented.

The above actions comprise the strategy for elephant management.[15] Two of the actions are no more than enlightened administrative decisions to be taken within the Ministry. The veterinary fence issue requires the MET to confer with the Directorate of Veterinary Services in Namibia and carry its representations into the transboundary forum with Botswana. The ongoing struggle with CITES lies in the political and administrative realm. The adaptive management decisions affecting exploitation of the elephant population are not for prescription in this management plan: they will emanate from the enlarged forum of co-management institutions. They will take into account a wider range of social, ecological and economic factors than have previously characterized elephant management and, because of this, there is a real opportunity to advance knowledge on elephant management.

The objectives in the Vision Statement should be realized sequentially.

> **Ecological objective 2**, that of conserving biological diversity, should be the first to be realized since it is not dependent on achieving the full financial value for elephants. It requires only pro-active decisions from the co-management forums. It will, of course, result in costs which may have to be met from the fiscus in the first instance: however, as success is achieved in the CITES forum, the costs of ongoing population reductions can be met from the return from elephant products.

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[14] In the 1960s, every local person in the Luangwa Valley received a half-pound of meat weekly from elephant control.

[15] In the discussion of limiting factors the provision of artificial water, competition with cattle and the effects of veterinary fences were mentioned as additional factors influencing elephant populations. These are discussed more fully in the *Background Study* (pages 65-66) together with the effect on habitats of elephants and fire acting in combination. Rather than deal with these as stand-alone topics in this management plan, it is preferred to treat them as agenda items to be addressed by co-management institutions.

Social objective 2, that of elephants benefiting people, should be realized next. The full suite of benefits will only be realized when elephant commodities achieve their real market value: however, sufficient benefits may flow in the early stages from trophy hunting, PAC and population reductions to maintain the positive momentum needed to achieve the other objectives. An important factor enters the equation here. Once the stakeholders feel secure that they really are in control of elephant management, the demands for quick financial benefits are likely to lessen and they will begin to think more deeply about the very complex problems involved in managing elephants.

Social objective 1 - that of reducing conflicts between elephants and people, should follow. Here, too, the effects of devolution will be paramount. As long as the stakeholders see elephant management as a State responsibility, it pays them to make a huge fuss about all elephant incidents which affect their livelihoods. Following devolution, the responsibility for solving the problem rests squarely in their court. And, for the first time, they will have to grapple with multiple competing factors which affect their livelihoods. If all elephants are eliminated, crop raiding problems will be solved: however, the larger income from good wildlife husbandry will also be lost. It must be remarked that there is little possibility of eliminating elephants: dispersal from the large Botswana population will replenish stocks continuously.

Ecological objective 1 - that of increasing the elephant range in Namibia, will depend on a number of factors. The achievement of the previous objectives should create the incentives for a transformation in land use. The State can assist at the national level by removing perverse incentives which favour other less productive forms of land use and, in particular, by bringing the veterinary fences issue under scrutiny. As transboundary wildlife initiatives gain momentum, economic multiplier effects should speed up the process, tipping the scales in favour of wildlife management. The international struggle over the ivory trade is unlikely to be won in the first rounds of the contest and may require incremental demonstrations of success to convince sceptics that policies are working.

The Economic Objective - that of achieving the full value of elephants over the maximum potential range in Namibia, is also dependent on progress with the previous objectives.

If the elephant range can be extended as far south as shown in **Map 4**, about half of Namibia (400,000 km^2) would contain elephants. If the full commodity values for elephant are finally achieved, under a sustainable use management regime involving elephant male trophy hunting and culling to prevent elephant population increase above a density of 1/km^2, the net financial return per unit area could be as high as US$3/ha (**Appendix 1**). The net income would be about US$120 million. Using the multipliers implicit in Barnes & de Jager (1995) the 'net value added' in economic terms would be more than double this amount.

Impacts

The impact of achieving the highest valued of land use is likely to be considerable – Namibia could improve its economy by an order of magnitude. It will provide the revenue for effective State conservation, elevate the standard of living for landholders with elephants and create the incentives for more land to be put under wildlife. Ultimately, it could revolutionize land use practices throughout the region and pave the way for TFCAs.

Monitoring

Monitoring of a range of specific biological parameters is implicit under adaptive management. The detailed requirements for making sport hunting quotas sustainable and achieving the aims of any population reductions are detailed in the *Background Study*. The 'Event Book' system (NNF 2004) is already producing the needed information for conservancies on conflict between elephants and humans. The annual record of revenues and incomes earned from State protected areas, conservancies and other communal land will provide the information needed to assess progress towards achieving the economic objective.

RISKS AND ASSUMPTIONS

Given the escalating human-elephant conflict and the extreme modification of habitats in north-eastern Namibia, the greatest risk to Government's position is to do nothing. The architects of Botswana's elephant management plan (DG 2004) have recommended that Namibia does not take a passive approach on the issue (G.C. Craig, *pers. comm.*). Failure to implement the necessary devolutionary measures and enter into co-management carries the real risk that local people will take matters into their own hands or, worse still, collaborate with illegal hunters from neighbouring countries.

Inactivity will not simply result in the *status quo* being maintained. Since the 1970s, elephant populations have collapsed in an apparently inexorable process across Africa.[16] Invariably it has happened in countries where the State asserts that it owns all wildlife and attempts to regulate all wildlife use. Murphree (2000) describes this 'Big Government' syndrome as one where the State's "authoritative reach exceeds its implementational grasp". The most spectacular population crashes have occurred in countries that have banned all exploitation of elephants, yet corruptly continued to feed the ivory trade (Parker 2004). These same countries have also been in the vanguard of those proposing an ivory ban.

There is little risk that any management interventions could have an adverse effect on the status of elephant populations in Namibia. Populations are expanding and being augmented by migration from Botswana and Zimbabwe. Provided the effects are properly monitored, experiments in management will provide a learning experience.

Assumptions

(1) Adequate funding will be available to the Directorate of Parks and Wildlife Management (DPWM) through the fiscus to maintain its essential functions in State protected areas (see FINANCE AND CAPACITY).

(2) Present legislation which prevents the devolution of rights over elephant will be amended.

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[16]AfrESG (1998) and Martin (1986) document the decline of elephant populations in various countries since the 1970s. Among the more spectacular population crashes have been those in Kenya, Tanzania, Uganda and Zambia.

(3) MET is willing to enter into co-management of elephants with legitimate stakeholders.

(4) The devolution of rights over elephant and the establishment of co-management institutions will create the conditions for an expansion of the present elephant range beyond State protected areas, create linkages between State protected areas and improve the security of existing populations.

(5) Botswana and Zimbabwe will not take steps to limit their elephant populations. Whether or not they do will have little impact on this management plan as an institutional structure will have been set up to cope adaptively with changing situations.

(6) Namibia will be successful in convincing the Parties to CITES that the democratic policy it is pursuing carries the greatest long-term prospects for conservation and rehabilitation of elephant populations. If this assumption is not satisfied, it does not invalidate the management plan: it simply means that the transition to higher-valued land use systems based on wildlife and the expansion of the elephant range will take longer.

Risks

(1) If the assumptions are satisfied, the risk of an outbreak of illegal hunting of elephants among Namibian citizens is minimal. However, successful conservation of elephants in Namibia may attract illegal hunters from outside its borders – particularly from poorer countries whose local peoples are not benefiting from wildlife.

(2) There is a real risk that veterinary control measures, even though not directed at elephant, could continue to prejudice the objective of expanding the elephant range. Without expansion of the elephant range, the problems of conflict between humans and elephants and damage to wildlife habitats will require more intensive management. The solutions to this problem do not lie solely within Namibia's borders and this risk becomes an externality. The establishment of robust democratic co-management institutions will greatly strengthen the Ministry's position in tackling the problem and, even if the *status quo* of veterinary fences does not change, management solutions may emerge from within such institutions.

(3) If Namibia alienates some Parties to CITES through taking extreme measures to re-establish its sovereignty over elephants, there may be reprisals that affect other aspects of financial aid to Namibia. This will have to be handled in the political realm. Namibia's moral position is strong and it will be a pity if pragmatism has to override morals – particularly where it prejudices long-term prospects for conservation and rural development.

(4) If Namibia undertakes management interventions that involve culling or cropping from elephant populations, there will almost certainly be a regional and international outcry. From the experience that Namibia already has with the publicity surrounding elephants, it takes no stretch of the imagination to visualize the extremes to which the propaganda might go.

It is here that co-management is vital. If Namibia can present to the outside world a unified position supported by its citizenry, it should be able to weather the storm.

FINANCE AND CAPACITY

This management plan differs from all previous species management plans in that very little funding is required to implement it. The main costs will lie in co-ordination (liaison in setting up co-management institutions) and implementation of any management activities that arise from co-management decisions (problem animal control and population reductions). The potential income from elephant management is substantial and should more than cover these costs. The State or primary stakeholders may have to advance funds for certain activities to take place and it is strongly recommended that this is the financial mechanism used. Because of the controversial nature of elephant management, it would be wise not to compromise any decisions taken between the Ministry and primary stakeholders by seeking either international donor funding or local NGO funding to support implementation.

The current project to strengthen the system of national protected areas (UNDP 2005) should provide the necessary funding and capacity for MET to carry out its normal functions, including law enforcement. The close alignment between the UNDP project and the management plan for elephant bodes well for forming co-management institutions. Under the project, northern Namibia would be managed under two main divisions: the north-west (which includes Etosha National Park) and the north-east (which includes the Bwabwata, Mamili, Mudumu and Khaudum national parks and Waterberg Plateau Park).

The income from elephants would be unable to contribute much to Government budgets for the north-west. There is no sport hunting of elephants in the State protected areas and no management interventions are proposed. Outside the State protected areas, income earned from trophy hunting accrues to conservancies rather than to the State.

In the north-east, elephant could play a significant role in meeting conservation costs. The potential earnings from an elephant population managed for trophy hunting while keeping numbers constant are given in **Appendix 1**. The extent to which this revenue would contribute to park conservation costs is shown below.

	Caprivi	Khaudum & Mangetti
Protected areas with elephants (km^2)	9,956	4,142
Required conservation budget under UNDP (2005) – N$ million	13.9	4.8
Cost/hectare N$	13.91	11.59
Potential revenue from elephant management N$/ha	8.71	8.71
% contribution of elephants	63	75
Present conservation budgets (approx) – N$ million	9.9	3.4
Allocation/hectare N$	9.94	8.28
Potential revenue from elephant management N$/ha	8.71	8.71
% contribution of elephants	88	105

It would more-or-less meet the present budget allocations for the north-east and would meet at least two-thirds of the budgets proposed under UNDP (2005). Even if the full value of ivory and elephant skin is not achieved, the revenue from sport hunting will provide some 75% of the amounts given in the table.

Over and above the revenue which would accrue to State protected areas (N$8.7/ha), an additional N$9.7/ha would be earned by safari operators. This figure is dependent on the assumed proportion of gross income that safari operators would pay the landholder (MET or local community) for the 'rental' of the trophy hunting concession including trophy fees. If a rental higher than 25% can be secured, the primary stakeholders would achieve a larger part of the total net income (N$18.4 per hectare) from this elephant management regime.

Over and above the costs assumed in Appendix 1, additional costs could arise for such items as the annual aerial census of elephant populations, provision of artificial water and control of fire. However, in previous species management plans (Martin 2002, 2003, 2004) detailed budgets have been prepared for these items and it would be duplication to resubmit them here. Moreover, to put forward budgets for management activities which are the prerogative of co-management institutions yet to be established would be premature.

TRANSBOUNDARY COOPERATION

Whilst recognizing the larger goal of creating a major transboundary conservation area extending from the north of Namibia eastwards through Angola, Botswana, Zambia and Zimbabwe, the initial strategy guiding the Transboundary Mammal Project was to build incremental initiatives with Botswana based on individual rare or valuable mammal species of common interest to both countries. Given the extensive range of elephants and the high profile of elephant issues in the KAZA TFCA region, the time may have come for the subject to be discussed in a broader consultative forum.

Most of the management activities identified for potential cooperation and collaboration between Botswana and Namibia at the Kasane Workshop (2002) and Windhoek Workshop (2003) repeat themselves in this Management Plan.

(1) Maintaining liaison between wildlife departments and communities managing wildlife on either side of the international border;

(2) Maintaining linkages between species subpopulations;

(3) Ensuring compatible forms of land use on either side of the international boundary;

(4) Expanding the available range for the species – which includes dialogue on veterinary control fences;

(5) Co-operating on law enforcement directed at illegal hunting;

(6) Controlling fire;

(7) Collaborating on aerial surveys to improve population estimates.

The issue of joint management of this species is a topic which has not arisen with the other species which have been the subject of transboundary dialogue. It would be highly desirable if a common management approach for elephants could be developed, in the first instance, between Namibia and Botswana but, after that, with the other countries sharing the elephant range.

So far, Botswana and Zimbabwe have not announced their intentions regarding elephant management. This plan is structured so that the management of elephants on Namibian soil is not dependent on decisions by neighbouring countries: It is, first and foremost, a national plan. However, if Namibia's neighbours expressed a wish to enter into large-scale joint management of elephants, there is nothing in the plan to preclude this. Indeed, Namibia would welcome the initiative. It is an extension of the co-management policy approach which Namibia will pursue at the national level.[17]

The corollary to this is that, if there is no agreement with neighbouring countries, it cannot reasonably be expected that Namibia will not undertake management interventions in the best interests of its local peoples and conservation imperatives. Namibia would, of course, keep its neighbours fully informed of its management decisions.

The management activities on which collaboration might occur are: –

(8) Setting hunting quotas and monitoring the sustainability of hunting

Both Botswana and Namibia allow sport hunting of elephants and the trophies are derived from a shared population. This is a test case for developing workable transboundary institutions which, in the first instance, result in cooperation on quota setting and, ultimately, lead to income sharing.[18] Some of the problems which might arise in co-management are (a) the fact that Botswana allows citizen hunting of elephants at reduced charges; (b) the present Botswana elephant quota is not distributed among areas in proportion to elephant population numbers (DG 2004, page 13); and (c) the uncertainty that exists about the relationship between trophy quality and quota setting.

(9) Problem animal control

With the escalating conflicts between humans and elephants in both countries, there are sound reasons to share experiences gained from PAC, including successful deterrents which do not involve killing elephants.

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[17]The issue may not be as simple as this. Namibia's co-management institutions would be based upon a far-reaching devolutionary policy. Co-management extending to neighbouring countries would need to be underpinned by the same principles for it to be entirely successful. The Utopian situation would be achieved when the TFCA was being managed jointly by local communities and their governments through a cascading structure of genuine co-management institutions.

[18]At the Kasane Workshop, the opportunity to develop such an institution involving Salambala Conservancy in Namibia and the Chobe Enclave community in Botswana was identified. These communities are directly opposite one another on the Chobe River and are almost certainly hunting from the same populations.

(10) Population reductions and/or sustainable harvesting of elephants

Although it was decided in 1991 to limit the Botswana elephant population to 60,000 animals, no population reductions took place (DG 2004, page 4) with the result that the population is now in the vicinity of 150,000 animals. Most rural communities in northern Botswana feel that there are too many elephants and that the number should be reduced (DG 2004, page 10). However, the practicalities are daunting: it would require the removal of some 5,000 animals annually simply to prevent further increase.

From the perspective of those Botswana stakeholders who seek to reduce human/elephant conflict and prevent further habitat modification, Namibia's removal of a substantial number of elephants in the Caprivi Region would be unlikely to achieve the desired objective. More likely would be a reduction in elephant dispersal and migrations through Caprivi causing increased pressure on habitats in Botswana. There are obvious grounds for collaboration.

Were Botswana to pursue a policy of consumptive utilization of elephants, the sustainable off-takes would be very high. DG (2004, page 12) estimate that the removal of 5,000 animals annually would yield about 20 tonnes of ivory, 4,000 tonnes of meat (wet weight) and 325 tonnes of dried salted hide. The constraints imposed by CITES reduce the value of this resource and lead logically to another area where collaboration would be beneficial.

(11) CITES constraints on trade in elephant products

At the time elephants were listed on Appendix I of CITES in 1989, a strong institution[19] was formed within the southern African region to contest the listing. At the Meeting of the Conference of the Parties in Kyoto in 1992, this alliance was able to introduce several resolutions which significantly affected the Treaty.[20] This institution was fundamentally altered in 1996 and, since then, has faded into obscurity. If the southern African countries still hold the fundamental viewpoint that all wildlife products should have value, there are strong grounds for resuscitating the alliance between states to perform more effectively in the CITES forum.

IMPLEMENTATION PROCESS & UPDATE PROCEDURES

Timing and Duration of Plan

Implementation of this plan should commence as soon as possible because of the rapidly changing situation of elephants in Namibia and the southern African region.

From the outset, an adaptive management monitoring programme should underpin the implementation of the Plan and test the underlying hypotheses regarding the response of elephant populations and habitats to various management interventions. The objectives, hypotheses and management activities in the plan should be modified as needed to take

[19]SACIM – the Southern African Centre for Ivory Marketing, which included Botswana, Malawi, Namibia and Zimbabwe and which maintained liaison with Mozambique and South Africa.

[20]Among these resolutions was one that recognised that trade could be beneficial for wild species and another that altered the criteria for listing species on CITES Appendices.

into account externalities which may arise (and almost certainly will arise) during implementation.

The first draft of this Species Management Plan was completed in April 2005 and was reviewed during April-May 2005. Following comments and decisions from the Directorate of Parks and Wildlife Management and the Directorate of Scientific Services in the MET, a second draft was submitted to the Ministry by June 2005. Subject to any further revisions which might arise from inter-ministerial discussions or transboundary liaison with Botswana, a Final Plan should be ready for adoption before the end of 2007.

This should be followed by meetings between the MET and primary stakeholders to discuss implementation. Central to the plan are the devolutionary aspects and the establishment of co-management institutions. Notwithstanding any modifications made as and when necessary during implementation, there should be a mandatory review of the plan every two years – preferably synchronized with the results from elephant population surveys. If any changes are needed in the plan, the document should be modified, updated and re-approved.

Appendix 1: Income from Elephant Management

The potential income from sustainable use of an elephant population management has been analyzed using the population model of Martin (2000). The management regime entails culling to prevent population increase combined with trophy hunting of males. Assumptions and formulae used in the model are as follows –

(1) The management treatment is applied to a population of 1,000 animals in an area of 1,000 km^2 (i.e. at a density of $1/km^2$). In the absence of any management this population would increase at a rate of 4.56% per annum. The percentage of the population to be culled is selected so that the population does not increase.

(2) Culling entails the off-take of complete elephant herds and includes males up to the age of 10 years. The probability of a male older than 10 years being present in a herd is set as: –

$$P_a = e^{-0.015\,(Age - 10)}$$

(3) An off-take of 3% of the population is sufficient to stabilize numbers. This percentage may seem low when taken from a population which, in the absence of culling, increases at 4.6% per annum. The explanation lies entirely in the preponderance of females in the off-take.

(4) It is assumed that 75% of all elephant calves between the ages of 2 to 8 years will be captured rather than killed. These would be sold to zoos and to approved local and regional buyers wishing to domesticate elephant or begin new wild populations.

(5) The change in the age structure of the population caused by culling allows a greater percentage quota for trophy hunting of males. A quota of 1% of the population is sustainable.

(6) To calculate the values of ivory, skin and meat obtained from the culling operation, the following formulae were used for males and females of specific ages: –

Ivory Weight of two tusks: –

$$I_{Age} = 1.88\,(0.1 + 0.2\,(Age - 2.5)^{1.2937})\ \text{kg}$$

$$I_{Age} = 1.88\,(0.1 + 11\,(1 - e^{-0.016\,(Age - 2.5)^{1.2742}}))\ \text{kg}$$

The multiplier for two tusks (*1.88*) is from Rodgers (*et al* 1978) and the formulae for the weight of one male and one female tusk are based on Pilgrim & Western (1986).

$$Price/kg = US\$\,(50 + 110 \cdot I_{Age}^{0.5})$$

Body weights

$$W_{Age} = 5{,}200\,(1 - e^{0.006\,(Age + 1.5)^{1.7}})\ \text{kg}$$

$$W_{Age} = 3{,}500\,(1 - e^{0.00892\,(Age + 1.5)^{1.7}})\ \text{kg}$$

Dressing out percentage = ***33%*** (wet weight); Price/kg wet meat = ***US$1.00***

Skin weight (dry, both sexes)

$$S_{Age} = 0.373\,W_{Age}^{0.67}$$ Price/kg dry skin = ***US$5***

The table on the next page gives the results of the management programme averaged over 100 years. It is assumed that markets for all products are operating normally.

FINANCIAL VALUE OF ELEPHANT MANAGEMENT PROGRAMME

Assumed values *(all figures in US$)*

Area	1,000	km^2	Exchange rate 1US$ = N$	6.2	
Elephant population	1,000	animals			

SPORT HUNTING

Trophy male quota	1.0	% of total population per year=	10	animals
Trophy fee US$	10,000	charged by operator		
Daily rate US$	1,000	charged by operator		
Minimum hunt days	14	Client charged for 14 days if elephant bull included in hunt		
Operating costs US$	200	per day (Safari operator's costs)		
Operator' rental	25	% of gross income (paid to landholder – MET or community)		
Weight of skin	100	kg dry skin/animal (assumes hunter takes 20% of skin)		
Body weight (adult male)	5,000	kg		

POPULATION REDUCTION

Culling quota	3.0	% of total population per year=	30	animals
Culling cost US$	300	per animal		
Calf capture US$	300	per animal (2-8 years old)		
Selling price for calves US$	1,000	per animal		
Capture success	75	% of animals 2-8 years old		
Price of skin US$	5	per kg (assumes markets operating)		
Dressing out percentage	33	% of body weight		

Meat value US$	1	per kg (wet weight)

Age-specific tusk weights, ivory prices, body weights and skin weights as per formulae on previous page

SPORT HUNTING

Safari Operator Gross income

Trophy fees	100,000
Daily rates	140,000
Skin	5,000
Subtotal	**245,000**

Operating costs

Operating costs	28,000
Rental	61,250
Subtotal	**89,250**

Safari Operator Net income **US$/ha**

	155,750	**1.56**
N$	*967,208*	*9.7*

MET or communityNet income

Rental	61,250
Meat	16,500
Subtotal	**77,750**

MET or communityNet income **US$/ha**

	77,750	**0.78**
N$	*482,828*	*4.8*

CULLING

MET or communityGross income

Ivory	38,350
Calf sales	14,630
Meat	12,696

MET or communityNet income **US$/ha**

	62,444	**0.62**
N$	*387,777*	*3.9*

Skin	5,768	**MET or community income**	**Total net**	**US$/ha**
Subtotal	**71,444**		**140,194**	**1.40**
Operating costs		*N$*	*870,605*	*8.7*
Culling costs	**9,000**			
		OVERALL TOTAL NET INCOME	**295,944**	**2.96**
		N$	*1,837,812*	*18.4*

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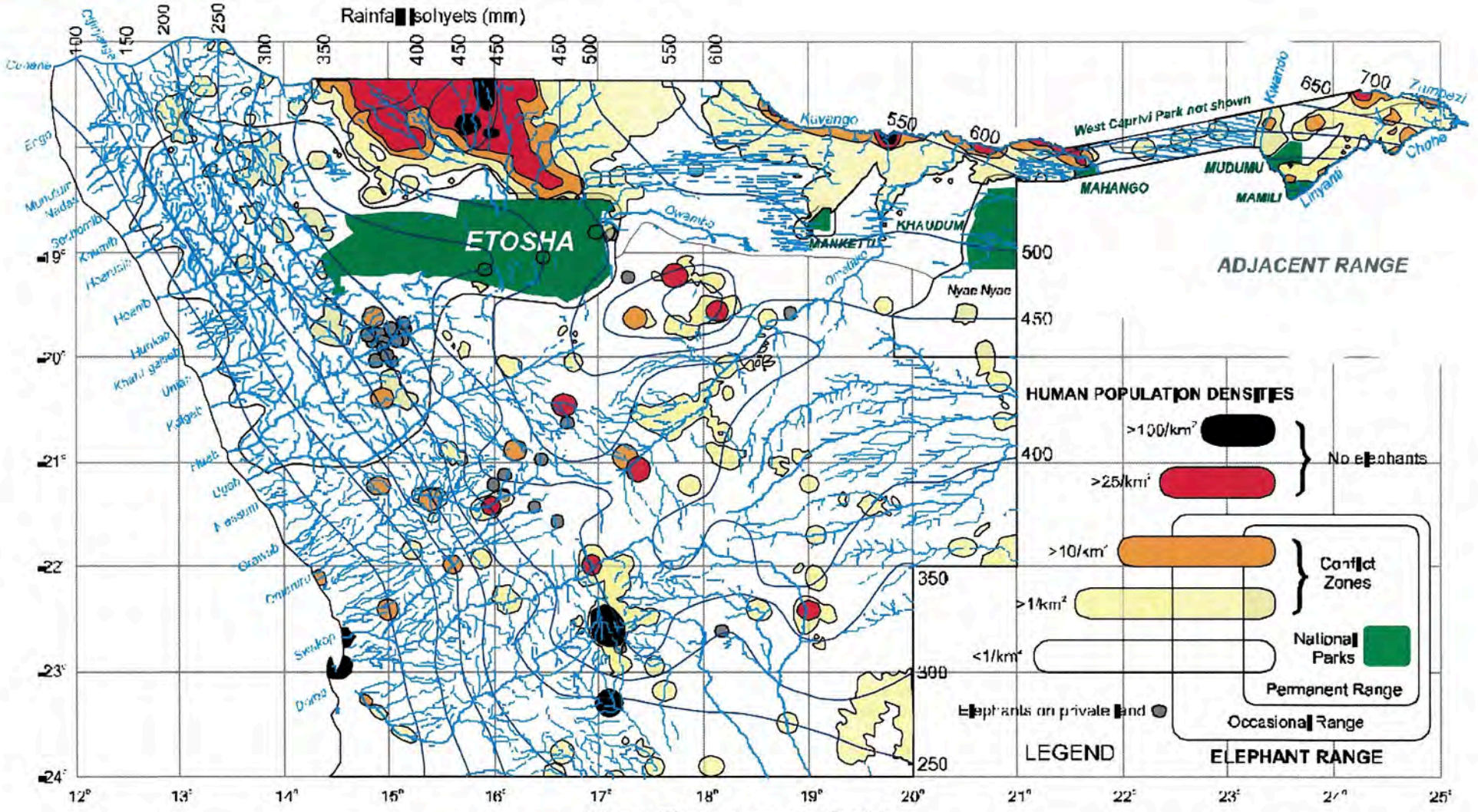
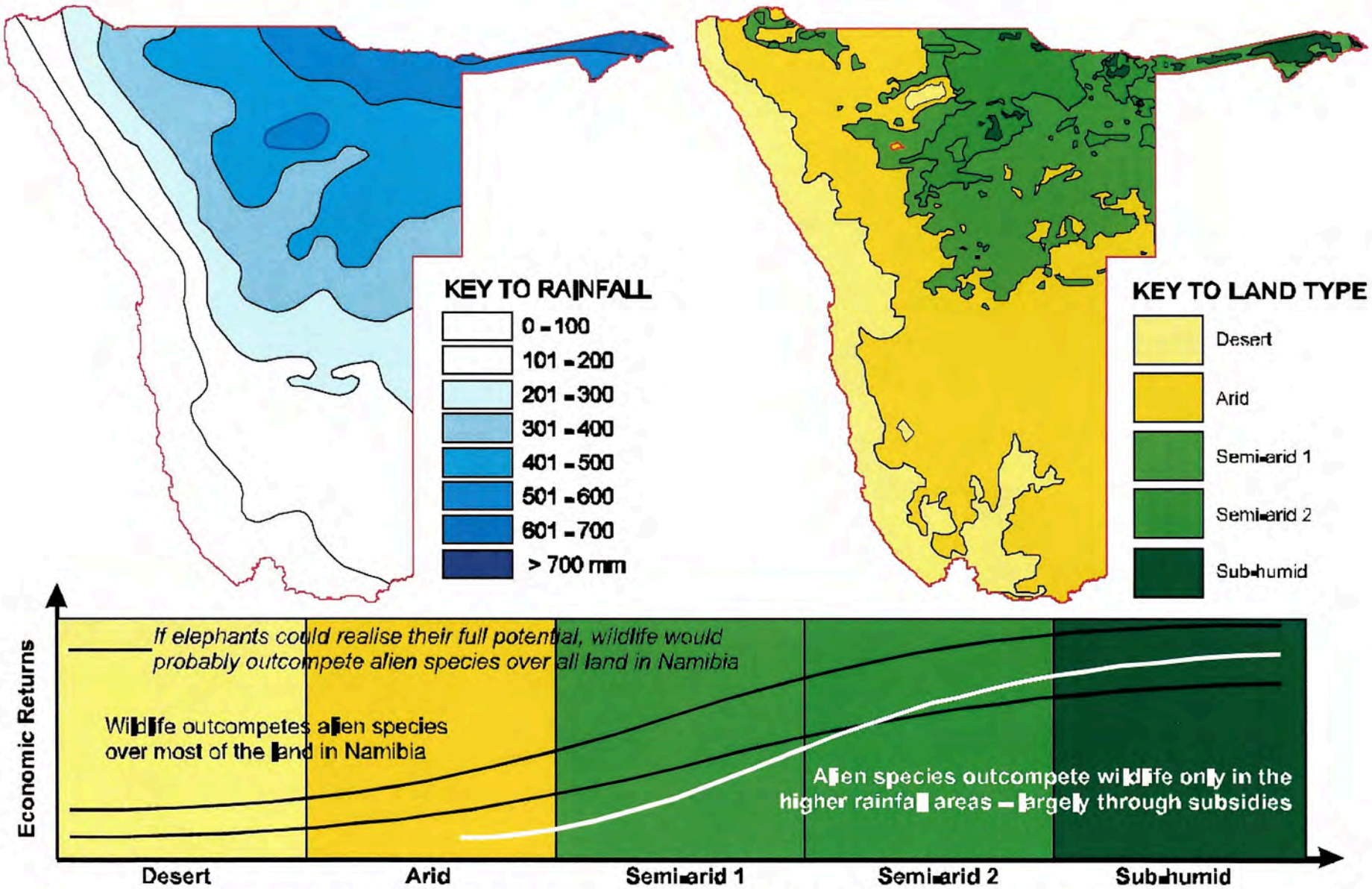
Map 1: Elephant range in southern Africa
based on AfrESG (2002)



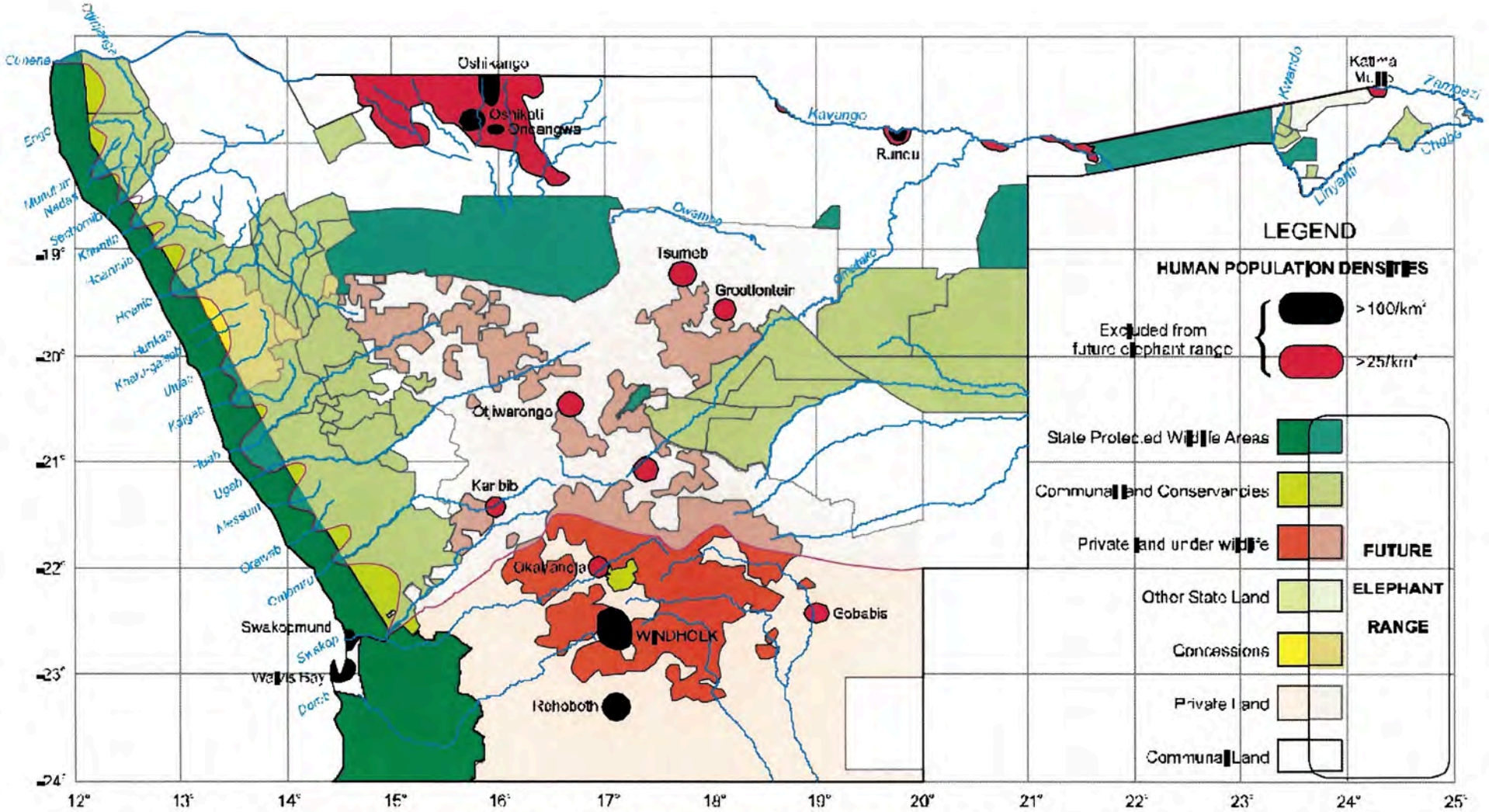
Map 1: Elephant range in Namibia

002443



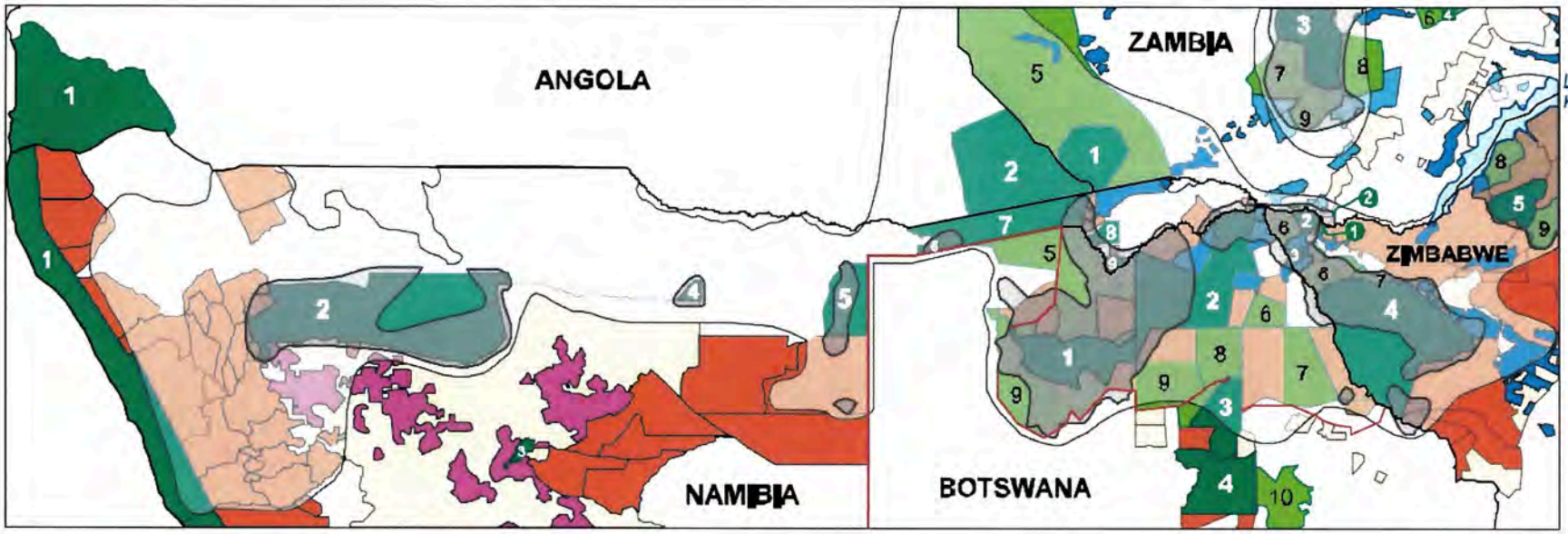
Map 3: Land capability and economic returns from land use in Namibia

002444



Map 4: The future range of elephants in Namibia ?

002445



LAND TENURE CATEGORIES

ELEPHANT RANGE

	None	Total Range	High Density
Communal Land			
Private Land			
State Protected Wildlife Areas			
SAs (Zw), WMAs (Bw), GMAs (Za)			
CBNRM, Conservancies (Na)			
Private Land Conservancies (Na)			
Forest Reserves			
Local Forest Reserves (Zambia)			

STATE PROTECTED WILDLIFE AREAS

ANGOLA
1 - Iona NP
2 - Luiana PR

NAMIBIA
National Parks
1 - Skeleton Coast NP
2 - Etosha NP
3 - Waterberg NP
4 - Mangetti GR
5 - Khaudum NP
6 - Mahango NP
7 - Caprivi GR
8 - Mudumu NP
9 - Mamili NP

BOTSWANA
National Parks
1 - Moremi GR
2 - Chobe NP
3 - Nxai Pan NP
4 - Makgadikgadi Pans

Wildlife Management Areas *with resident local communities*
5 - Kwando
6 - Nutiga
7 - Nata State Lands
8 - Ngami State Lands
9 - Okavango
10 - Botetli State Lands

ZIMBABWE
National Parks
1 - Victoria Falls NP
2 - Zambezi NP
3 - Kazuma Pan NP
4 - Hwange NP
5 - Chizarira NP

Safari Areas *(unsettled)*
6 - Matetsi
7 - Deka
8 - Chete
9 - Chirisa

ZAMBIA
National Parks
1 - Sioma Ngwezi NP
2 - Mosi-oa-Tunya NP
3 - Kafue NP
4 - Lochinvar NP

GMAs *(ADMADE)*
5 - West Zambezi
6 - Kafue Flats
7 - Mulobezi
8 - Bili Springs
9 - Sichifula

National Boundaries
Veterinary Fence

Map 5: The transboundary range of elephants in relation to the Namibian population

002446

RCVD JUN 19 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

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

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

Section A. Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
MESTOUSIS	PANTELIS	P.	M
(b) (6) [redacted]	3.a. Alternate Telephone Number	(b) (6) [redacted]	

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Pelham	N.Y.	10803	Westchester	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) [redacted] 5/4/18

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.

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

PETER MESTOUSIS, (b) (6) [redacted]

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

(No) Yes

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

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name. 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:
   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

(b) (6)

Fax: +27

E-

Vaalwater Web: 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 rejuvinate 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

Reinhard Heuser
Owner Kwalata Wilderness

LIMPOPO
PROVINCIAL GOVERNMENT
REPUBLIC OF SOUTH AFRICA

Enquiries: Mr. E. T Moeng
Cell: 0824126898
Email: moengetl@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 07th of March 2017.
3. This plan is approved in terms of the requirements of the [1]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

[1] 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: (b) (6) 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).

MacDonald, Tim <tim_macdonald@fws.gov>

U.S. Fish and Wildlife Service Prt # 95612C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Fri, Aug 23, 2019 at 9:51 AM
To: (b) (6)

Pantelis Mestousis,

On **06/19/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 95612C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

Re: [EXTERNAL] Re: U.S. Fish and Wildlife Service Prt # 95612C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Wed, Sep 4, 2019 at 2:00 PM
To: (b) (6)

Pantelis,

All elephant trophy applications are currently under review.

Thank you,

Tim Mac Donald

Government Information Specialist
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 Wed, Aug 28, 2019 at 11:15 AM (b) (6) wrote:

> Tim,
>
> Please see below for the requested information for Application request for South African Elephant import permit request.
>
> Per our application, the elephant was successfully harvested on August 5th, 2018 on the Farm Akkervlyt in South Africa.
>
> If you could kindly provide me with a status update after updating the application with this information I would greatly appreciate it.
>
> Thank you
> Pantelis Mestousis
>
> -----Original Message-----
> From: MacDonald, Tim <tim_macdonald@fws.gov>
> To: pmwaves (b) (6) >
> Sent: Fri, Aug 23, 2019 9:51 am
> Subject: U.S. Fish and Wildlife Service Prt # 95612C
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Please confirm at this me if you successfully hunted the elephant. If **yes**, please state so, and provide the date and loca on the elephant was taken.

If **no**, do wish to withdraw your applica on at this me?

Please confirm the current status.

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Form 3-200-20

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

RCVD JUN 20 2018

48

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

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
GAGLIO	ANTHONY		
2. Date of Birth (mm/dd/yyyy) 2. Telephone Number: (b) (6) [redacted]	3.a. Alternate Telephone Number	4. E-mail address MATT@GENUSLOGISITCS.COM	

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
STAMFORD	CT	06903	US	US
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions (50 CFR 13.11(d)).
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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

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1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via 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@GENUSLOGISITICS.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: 6/14/18

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).

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

3. Importer (name and address)

(b) (6)

3a. Country of import

4. Exporter / Re-exporter (name,address and country)

Signature of the applicant

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.

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)

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. Loxodonta africana	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. Loxodonta africana	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 progated for commercial purposes
*** for pre-Convention specimens

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
08 JUN 2018
CITES
Private Bag 13306 • Windhoek
Tel: 284823 • Fax: 258861

13. THIS PERMIT IS ISSUED BY

Place

Date

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT

15. Bill of Landing / 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.:		Ø2170806

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. S. Gaglio

Residential Address:

Country: U.S.A

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

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
I	Crocodile	
	Dik-dik	
	Eland	1x
II	Elephant	1x
	Giraffe	1x
	Grey Duiker	2x
II	Hippopotamus	
	Impala. Black-faced	
	Impala. common	
	Klipspringer	
	Kudu	2x
II	Leopwe	
	Oryx (Gemsbok)	2x
	Ostrich	1x
	Red hartebeest	1x
	Reedbuck.	
I	Rhinoceros, black	
I	Rhinoceros, white	
	Roan	1x
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	2x
	Warthog	2x
	Waterbuck	
	Wildebeest, blue	2x
	Zebra, Burchell's	
II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
I	Cheetah	
I	Leopard	
II	Lion	
	Other Kori Bustard	1x
	* Please report back within 48 hours after being Shot.	

MINISTRY OF ENVIRONMENT AND TOURISM REPUBLIC OF NAMIBIA 2017 -10- 30 WINDHOEK PERMIT OFFICE Private Bag 13306, Windhoek Tel: 2842111 Fax: 258861

on the following farms / hunting concessions: Nyae - Nyae Conservancy

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

MINISTRY OF ENVIRONMENT & TOURISM
Elvis Markel E-Mkel.
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

Official MET date stamp

MINISTRY OF ENVIRONMENT AND TOURISM REPUBLIC OF NAMIBIA
2017 -10- 30
WINDHOEK PERMIT OFFICE Private Bag 13306, Windhoek Tel: 2842111 Fax: 258861

The following certificate must be completed immediately after each animal that has been hunted (please print) 175 911

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
08/11/17	Elephant		30.4kg		27.3kg			0	M	Nyae-Nyae Conserv			[redacted] (9) (b)	
9/11/17	Oryx	78	75	18.5	19	190.5		0	M	Nyae-Nyae Conserv				

*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 hunding 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 I 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, _____ or a _____ doing business as _____ residing at (b) (6), Stamford CT 06903 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 licensed broker as required by thr Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize, to receive any merchandize 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 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 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 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) Anthony Gaglio
has caused these presents to be sealed and signed:

*(Signature) (b) (6)

(Capacity) _____ *(Date) 2/13/18

WITNESS (b) (6)

(b) (6)
(b) (6)
(b) (6)
(b) (6)
(b) (6)
(b) (6)
(b) (6)

– An Endangered Species
Doing, Doing ?
(b) (6)
(b) (6)

lb

161-15 Rockaway Blvd Suite 205
Jamaica NY 11434
Tel: 718 844 6056
Fax: 516 400 9787
matt@genuslogistics.com
CUSTOMS BOX 205 USFW BOX 66

GENUS LOGISTICS®

9/10/19

To USFW DMA
Re: PRT 97797 Additional backup that proves this activity will enhance or benefit wild populations of the species involved

Please be advised I sent the attached awhile back but did not get a receipt of submittal. I am FedEx now, so I have a receipt. Please add to PRT 97797C and take into consideration for issuing permit.

Thank you

Matt Mayers
Genus Logistics
161-15 Rockaway Blvd Suite 205
Jamaica NY 11434
Tel 718 790 0216
Fax 516 400 9787
Matt@genuslogistics.com
www.genuslogistics.com

Matt Mayers

From: SPITS-II Production Email Messenger <permits@fws.gov>
Sent: Thursday, June 21, 2018 1:30 PM
To: Matt Mayers
Cc: permits@fws.gov
Subject: Jun 21 2018 1:30:00; Acknowledgement letter for Permit No. "97797C""

ANTHONY GAGLIO
(b) (6)
U.S.A.

***This is an automatically generated email, please do not reply to this message**

***For questions please send an email directly to managementauthority@fws.gov ***

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 06/20/2018; check number 3683 accompanied the application for AFRICAN ELEPHANT. Your application has been assigned the following PRT identification number: MA97797C-0While 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 notification to make any inquiries. Should you have additional information that you need to provide to our office pertaining to the current request, we ask that you call our office first at 800-358-2104 or email managementauthority@fws.gov to obtain further instructions.

Matt Mayers

From: Anthony Gaglio (b) (6)
Sent: Monday, July 30, 2018 1:46 PM
To: Matt Mayers
Cc: Anthony Gaglio, Jr; Kacy Hey
Subject: RE: Delays on pending Elephant and Bontebok ESA import permits via DMA

Matt

This is what I got back from the outfitter. Let me know what else you need to expedite the ivory shipment

Hi
Herewith the answers that I could provide will also paste the answer I got from my shipping agent about these questions.

1: The population growth of Elephants in this area has been huge sins the late 80's with the first Elephants only seen in the late 70's. We have seen a growth of almost 1250 %. With elephants numbers being +/- 150 in 1988 to 3000 on the last count in 2017. The conservancy with conjunction with the ministry of Environment and Tourism does annual counts there for we can really say what or resident population is.

2: The trophy fee was $45000-00 and all of that went to the conservancy of Nyae-Nyae. They in return maintain waterholes, schools, vehicles that are used for antipoaching and assisting local population with every day needs, ranger training, vegetable gardens and the list goes on to up bring the area and its wildlife to what it has become today, they alone employ over 30 people that benefits directly from the payments dane by the safari operator.

3: In addition to the total payment done every year by the safari operator of more than $350 000.00 to the conservancy, they have the responsibility for all the game water points in the area which is more then 17 at this stage. This is a very dry area and it would be impossible for any game to survive in this area without these water point that are kept and maintained by the safari operator. Anti-poaching patrols are done on regular basis and then they employ 12 local people in their safari camps which benefits directly from the hunting. All the meat from the elephants shot tin the area are distributed between the people and provide them with a much needed source od protein. As long as the population know that they benefit from these Elephants they will look After them and they have value to them.

Let me know if you need more
All the best
Stephan

From: Maria Felix
Date: 27 July 2018 at 19:09:56 GMT+2
To: Pam Foerster <pam-iacs@afol.com.na>
Cc:
Subject: Re: FW: Whatapp message

It's taking a long time to process import permits for elephants because now it's on a case by case basis. What F&W is looking for are enhancement findings. It used to be per country but I am not sure if it is per hunting area now. Your wildlife office would know as they supply data to F&W. I would be very interested to hear what they tell you if you call your contact there. Meanwhile, check with the outfitter if they have updated management and statistical reports on

the hunting area and other info as requested by F&W. Once they submit to F&W and gets evaluated and positive findings are found then the permit can get processed.

On Fri, Jul 27, 2018, 2:18 AM Pam Foerster <pam-iacs@afol.com.na> wrote:

Anthony Gaglio Sr.
President

(b) (6)

CONFIDENTIALITY NOTICE:
The information contained in this e-mail and any attachments hereto is confidential. If you are not the intended recipient, you must not use or disseminate any of this information. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and permanently delete the original e-mail (and any attachments hereto) and any copies or printouts thereof. Although this e-mail and any attachments hereto are believed to be free of any virus or other defect that might affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by Viking Construction, Inc. or its subsidiaries or affiliates, either jointly or severally, for any loss or damage arising in any way from its use.

From: Matt Mayers <matt@genuslogistics.com>
Sent: Wednesday, July 25, 2018 3:27 PM
To: Matt Mayers <matt@genuslogistics.com>
Subject: Delays on pending Elephant and Bontebok ESA import permits via DMA
Importance: High

Good day,

If you are in receipt of this e-mail, then Genus Logistics is awaiting either an Elephant or Bontebok import permit for your account. DMA (Division of Management Authority) who issues the permits has not issued any new or renewed permits for over 7 months. I have asked DMA numerous times as to status with very little feedback until recently. They advised that they are awaiting the courts to issue guidelines in regard to ESA permits being issued on a case by case basis.

Being these permits will be issued on a case by case basis I want to provide them with additional information, so they can make their finding positive and assist them in issuing once they have a plan.

Please see following three questions and provide you answers as best you can along with any additional evidence. Please send letter in PDF/Word Format and email to matt@genuslogistics.com I will forward to DMA, so they can add to your file for review.

U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt

or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Should you have any questions or concerns on this matter please do not hesitate to reach out.

Thank you for your patience and safe hunting.

Matt

Matt Mayers
Genus Logistics
161-15 Rockaway Blvd Suite 205
Jamaica NY 11434
Tel 718 790 0216
Fax 516 400 9787
Matt@genuslogistics.com
www.genuslogistics.com

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.:		Ø2170806

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. S. Gaglio

Residential Address:

Country: U.S.A

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

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
I	Crocodile	
	Dik-dik	
	Eland	1x
II	Elephant	1x
	Giraffe	1x
	Grey Duiker	2x
II	Hippopotamus	
	Impala. Black-faced	
	Impala. common	
	Klipspringer	
	Kudu	2x
II	Lechwe	
	Oryx (Gemsbok)	2x
	Ostrich	1x
	Red hartebeest	1x
	Reedbuck	
I	Rhinoceros, black	
I	Rhinoceros, white	
	Roan	1x
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	2x
	Warthog	2x
	Waterbuck	
	Wildebeest, blue	2x
	Zebra, Burchell's	
II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
I	Cheetah	
I	Leopard	
II	Lion	
	Other Kori Bustard	1x
	*Please report back within 48 hours after being shot.	

MINISTRY OF ENVIRONMENT AND TOURISM REPUBLIC OF NAMIBIA 2017 -10- 30 WINDHOEK PERMIT OFFICE Private Bag 13306, Windhoek

on the following farms / hunting concessions: Nyae Nyae Conservancy

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

22-07-2019 Original with MET

Official MET date stamp

MINISTRY OF ENVIRONMENT & TOURISM
Elvis Markel E-Mkel.
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.

MINISTRY OF ENVIRONMENT AND TOURISM REPUBLIC OF NAMIBIA
2017 -10- 30
WINDHOEK PERMIT OFFICE Private Bag 13306, Windhoek Tel: 2842111 Fax: 258861

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) 175 911

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
08/11/17	Elephant		30.4kg		27.3kg			8	M	Nyae - Nyae Conserv.			[redacted] (g) (g)	
9/11/17	Oryx	78	75	18,5	19	190.5		8	M	Nyae-Nyae Conserv.				

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 hunding 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.

[EXTERNAL] Supplement to Import Permit Application # 97797C - Anthony Gaglio

Aimee Korver <permits@conservationforce.org>

Thu 6/25/2020 10:24 AM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

1 attachments (5 MB)

Gaglio,AnthonySupplementtoApplication.zip;

Ms. Brisendine,

Attached you will find a Notice or Representation, a letter with Supplemental information for Mr. Gaglio's import permit application #97797C (answers to question 9), and enhancement documentation related to the answers for section 9.

If you have any questions regarding this matter, please do not hesitate to contact me.

Kindest Regards,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

† Baron Bertrand des Clers, Ph.D.
† James G. Teer, Ph.D.
† Bart O'Gara, Ph.D.
† Don Lindsay
†Bert Klineburger

Executive Committee:

John J. Jackson, III, J.D.
Chrissie Jackson
Philippe Chardonnet, D.V.M.
Bert Klineburger
Shane Mahoney
Renee Snider

June 24th, 2020

ATTN: Amy Brisendine VIA E-MAIL CORRESPONDENCE
Department of the Interior
U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

RE: PRT# MA97797C – Supplement to Elephant Import Permit Application Anthony Gaglio

Ms. Brisendine:

This is a supplement to the above referenced permit application for Mr. Anthony Gaglio (PRT # 97797C)

Answers to Question 9

9a. Do you have any information regarding the population status or trend data on the species hunted?

Please see the attached CITES document entitled, "Consideration of Proposals for Amendment of Appendices I and II" , which states that "the Namibian elephant population is secure and growing, and the availability of habitat for elephants is increasing."

9b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Please, see the attached Operator Enhancement Report which details how funds are used by this safari operator

9c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please see the attached Operator Enhancement report as well as the article from The Namibian on the winning of the Conservation Award by the Nyae Nyae Conservancy, which is Namibia's oldest conservancy and recently received this award for their outstanding efforts in wildlife conservation and game management from the International Council for Game and Wildlife Conservation (CIC). Here is also a link to a video Chief Tsamkxao ≠Oma of Nyae Nyae Conservancy in Namibia explaining why conservation hunting is important to the Ju/'hoansi

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

EXECUTIVE COMMITTEE:

JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
BERT KLINEBURGER
SHANE MAHONEY
RENEE SNIDER

San people, and how he feels about the award of the Edmond Blanc Prize to the conservancy and its stakeholders. https://www.youtube.com/watch?v=e110hk0iMb4

Thank you,

Aimee Korver
Permits Division Conservation Force

:Enclosures

a. Notice of Representation
b. CITES document, , "Consideration of Proposals for Amendment of Appendices I and II"
c. Operator Enhancement Report
d. The Namibian Article on Nyae Nyae wins conservation award

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

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a Permit to Import a threatened-listed Elephant Trophy from Namibia.

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 this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservationforce.org

(b) (6)

SIGNATURE

Anthony Gaglio

ANTHONY GAGLIO

5/15/20

DATE

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

Seventeenth meeting of the Conference of the Parties
Johannesburg (South Africa), 24 September – 5 October 2016

CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

A. Proposal

To delete the annotation to the listing of the Namibian African elephant population in Appendix II by deleting any reference to Namibia in that Annotation.

B. Proponent

Namibia*

C. Supporting statement

Currently, the Namibian elephant population is listed in Appendix II with an annotation contained in Annex I of this document. Namibia, with this proposal, seeks the removal of this annotation in its entirety in respect of our elephant population. This can be achieved by deleting any reference to "Namibia" in the annotation.

This annotation in sub-paragraph h) states that "no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii). In addition such further proposals shall be dealt with in accordance with Decisions 14.77 and 14.78 (Rev. CoP15)."

Decision 14.77 requires that "The Standing Committee, assisted by the Secretariat, shall propose for approval at the least at the 16th meeting of the Conference of the Parties a decision-making mechanism for a process of trade in ivory under the auspices of the Conference of the Parties."

This Decision formed part of an amendment to Proposal CoP14 Prop 4 and related draft Decisions (CoP14 Inf. 61) adopted at the 14th meeting of the Conference of the Parties to CITES [CoP14 Plenary 6 (Rev. 1)] that was a compromise that included an agreement by Botswana, Namibia, South Africa and Zimbabwe to a nine-year moratorium and the development of the African Elephant Action Plan.

As elaborated in document CoP17 Doc. 84.3, Decision-making mechanism for a process of international trade in ivory, submitted by Namibia, South Africa and Zimbabwe, in nine years, no substantive progress has been made in the implementation of this Decision. There is no substantive proposal that will be considered at the 17th meeting of the Conference of the Parties as far as Namibia is aware of other than the proposal submitted by Namibia, South Africa and Zimbabwe in CoP17 Doc. 84.3.

The establishment of a Decision Making Mechanism for a process of future trade in ivory was an integral part of the compromise reached that was incorporated in an amendment to Proposal CoP14 Prop 4 and related draft Decisions (CoP14 Inf. 61) adopted at the 14th CoP to CITES [CoP14 Plenary 6 (Rev. 1)] that further included an agreement by Botswana, Namibia, South Africa and Zimbabwe to a nine-year moratorium and the development of the African Elephant Action Plan.

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* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.*

Namibia contends that a failure to establish this Decision Making Mechanism within the agreed process and time frame significantly undermines the needs and interests of the affected range States including Namibia and their conservation objectives and programmes, which rely on:

a) the creation of positive incentives for landholders, whether communal or private, and to set land aside for elephants and to co-exist with them instead of opting for forms of land use that would displace elephants and cause the loss of their habitat; and

b) the generation of revenues from the sale of elephant products to finance elephant conservation programmes, including the management of protected areas and the combatting of illegal killing and trade.

The current situation negatively affects African elephant range States, including Namibia, and therefore runs counter to the letter and spirit of previous agreements made and decisions taken by the Conference of the Parties and infringes upon the legitimate rights of Parties enshrined in the text of the Convention.

Namibia supported the drafting of the annotation as part of a compromise that would result in an objective process regarding future trade in ivory that should not repeatedly have to be discussed by the Conference of the Parties in the manner that characterized such debates in the past. Namibia's African elephant population does not meet the criteria to be listed in Appendix I and compromises reached to address the needs of other range States, while foregoing our own, should be honoured. This will ensure that specific provisions that form part of the compromise are implemented and would not render the annotation inoperable.

If the 17th meeting of the Conference of the Parties does not approve a Decision Making Mechanism, the proponents of this document would consider the current annotation, negotiated as a compromise at COP14 and subsequently not implemented, as *pro non scripto* (as though it had not been written).

Namibia furthermore agrees with Zimbabwe in Proposal CoP17 15 that "Resolution Conf.11.21 (Rev.CoP16) makes the distinction between annotations for reference purposes and substantive annotations. The latter are generally used to qualify the permitted extent of trade in Appendix II species. An examination of Fauna listed on Appendix II suggests that most of the annotations are 'enabling' – that is, they permit trade (constrained by quotas) in situations where the remainder of range States' populations is listed on Appendix I (e.g. vicuña and crocodiles). The annotation for *Loxodonta africana* is entirely different. It is a long list of proscriptions constraining the trade in elephant specimens."

In light of the failure to honour the compromise, Namibia would not consider herself bound by any annotation that exceeds in scope the purpose of clarification and which adds trade-restricting provisions that are not provided in the text of the Convention.

In acceding to CITES in 1992, Namibia ratified the text of the Convention. The present annotation pertaining to its elephant population on Appendix II has departed a long way from Article IV of the treaty. In our view, the annotation is *ultra vires*.

Namibia, with this proposal, wishes to establish a regular form of controlled trade in all elephant specimens, including ivory, in support of elephant conservation, including community-based conservation and the maintenance of elephant habitat. Revenue from regulated trade will, as previously, be managed through a trust fund and used exclusively for elephant conservation and community conservation and development programmes within the elephant range.

Conservation and management of Namibia's elephants: The Namibian elephant population is secure and growing, and the availability of habitat for elephants is increasing. Our conservation model has enabled the expansion of the elephant population from just over 7500 in 1995 to over 20,000 at present. The biggest potential long-term threat to the Namibian elephant population is nevertheless the loss of habitat and the fragmentation of range through the interruption of access routes and conflicts with people in the absence of effective incentive mechanisms to maintain such habitat. Elephants, through their negative impacts on subsistence agriculture and absolute dependence on water resources under the control of people, can easily be excluded from large parts of Namibia outside protected areas. Without a way of benefiting from elephants, elephants are regarded as a liability and economic cost to rural communities, who suffer crop losses, other damages and lose human lives to elephants. 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 resource management, in combination with economic and financial incentives through sustainable use, and linked with skills development and capacity building, have been driving

forces behind changes in attitudes towards wildlife on communally-owned land in Namibia. In parts of the elephant range outside protected areas, wildlife numbers have increased dramatically, and the level of illegal killing is not detrimental to our elephant population. Controlled trade in ivory and other elephant specimens, in addition to other direct and indirect forms of economic use of elephants, is therefore in the best interest of the Namibian elephant population. Controlled trade will help to ensure continued access to land outside protected areas by providing strong incentives to communities to protect elephants and their habitat. By contrast, law enforcement alone, without associated incentives, does not provide long-term security from displacement by other forms of land use.

Export of ivory in 1999 and 2008: Namibia fully complied with every requirement imposed by the Conference of the Parties, the Standing Committee and the CITES Secretariat concerning the trade in raw ivory in 1999 and 2008. Namibia contributed to the development of a rigorous international trade control system for raw ivory and successfully exported raw ivory in 1999 and 2008 within that system. These export trades were successful in all respects, and were conducted transparently and under intense international supervision. Namibia demonstrated with this trade of ivory to Japan and China in 1999 and 2008 that all necessary trade controls are in place. It has a functional trust fund under parliamentary supervision for the distribution of trade revenues, all of which are earmarked for conservation. The implementation of Decision 10.1 proved that, with adequate controls and strict enforcement measures, ivory can be traded legally, in such a way as to prevent any ivory other than registered legal stocks from entering such legal trade.

Commitment to other CITES requirements concerning elephant conservation: Namibia has complied with every requirement of CITES concerning the conservation of the African elephant. Namibia continues to exercise strict control over all ivory stocks, but remains concerned over the high costs and security implications of holding large ivory stocks. Ivory continues to accumulate, primarily through natural mortalities. The climate in Namibia is dry, making it virtually impossible to maintain ivory quality without incurring huge expenditures. Namibia has reported all information on ivory stocks, seizures and quotas and the implementation of the MIKE monitoring system within Namibia is now in its 16th year.

Fundamental rights of Namibia within CITES and the role of the Conference of the Parties: Namibia has done its utmost, and at great cost, to make use of the mechanisms provided in CITES to exercise its rights as a Party to the Convention. These rights include trade in its elephant population, which clearly meets the criteria for inclusion in Appendix II, within the framework of the Convention for trade in specimens from Appendix-II-listed species. In disregard of the remedial mechanisms within CITES concerning cases of unsustainable trade in Appendix-II-listed species, such as the significant trade process or the transfer of a population to Appendix I, the Conference of the Parties has on previous occasions imposed increasingly complex requirements for trade in elephant specimens that have all but ensured that such trade does not take place. Namibia believes that this trend strongly undermines the credibility of CITES and highlights the contradictions between CITES and the Convention and Biological Diversity. The Conference of the Parties is accordingly requested to fully consider this issue in its decision on this proposal.

Frustrating the legitimate objectives of a Party concerning a proposed trade that complies in all respects with the provisions of the Convention through an unjustifiable and unwarranted delay in executing an action agreed by the Conference of the Parties within the specified time frame, i.e. the establishment of the decision-making framework, cannot be accepted.

1. Taxonomy

1.1	Class:	Mammalia
1.2	Order:	Proboscidea
1.3	Family:	Elephantidae
1.4	Species:	*Loxodonta africana* (Blumenbach, 1797)
1.5	Scientific synonyms:	None
1.6	Common names:	English: African elephant French: Elephant d'Afrique Spanish: Elefante Africana
1.7	Code numbers:	CITES A-115.001.002.001 (1984(1)) ISIS 5301415001002001001

2. Biological Parameters

2.1 Distribution

Historically, elephants occurred at comparatively low densities throughout Namibia, wherever surface water could be found during the dry season and at highly variable densities over larger areas during past wet seasons. Currently, elephants are found in a continuous zone across northern Namibia, and although some of this range is infrequently used, elephants are becoming more abundant in areas from which recently they were absent (Fig. 1). Elephants in Namibia are migratory-nomadic and depend on their mobility to exploit favorable opportunities over a very large range. They typically have distinct dry season ranges and a much larger wet season dispersal range (estimated at over 100,000 km^2). Elephant distribution in Namibia has been expanding as the result of population increases, and increasing habitat availability.

2.2 Habitat availability

Elephants in Namibia occur in the northern Namib Desert, the central northern *Colophospermum mopane* savannas, semi-arid woodlands of the northern Kalahari system and riparian systems of the Okavango, Kwando, Chobe, Linyanti and Zambezi Rivers in the northeast of the country. This area includes three distinct land tenure categories, namely protected areas, communally-farmed State land and freehold land. The availability of habitat for elephants in protected areas in Namibia significantly increased during the past century, through the development of the protected area network and by the provision of surface water in addition to existing springs and rivers.

Elephants are not confined to any protected area, however, and elephant habitat should be seen within the context of seasonal and longer-term variation in elephant distribution and human settlement as influenced by climatic variation. The bulk of elephant range outside protected areas falls within the category of communal land principally used for subsistence farming. In this regard, 82 communal land conservancies have been registered with several more emerging (see Fig. 1). In 2004 when Namibia last proposed an amendment to the listing of her elephant population, this number was 31, indicating the tremendous growth in our community based natural resource management programme. Communal conservancies are formed with the primary reason of benefiting communities from the sustainable utilization of natural resources. More than 100 000 km^2 (35 000 km^2 in 2004) of land within the elephant range outside protected areas is now included in registered communal conservancies. Many of these conservancies fall within the critically important districts in northern Namibia that serve as the migratory routes, drought corridors or seasonal range of several thousand elephant and the potential dispersal area for even more elephants concentrating in the Chobe-Linyanti system along the Botswana border and the Chobe National Park (hereafter N.P.) in Botswana.

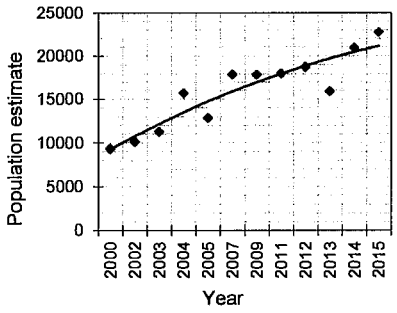
2.3 Populations status

The following table shows the most recent estimates of the main elephant populations in Namibia, obtained from aerial surveys, based on standardized sample counting techniques. It must be noted that elephants are highly mobile in Namibia, and that movement in and out of areas can therefore cause major periodic fluctuations in numbers over time.

Area	**Year of latest estimate**	**Estimated elephant population**
North-East Parks and surrounding areas	2015	13 136
Khaudom National Park	2015	4 150
Nyae-Nyae Conservancy	2015	2 263
Kunene Region	2009	352
Etosha National Park	2015	2 810
	Total	

2.4 Population trends

The Namibian elephant population is viable in all respects and is increasing. The figure shows the elephant population trend in Namibia since 2000 based on aerial surveys. Estimates since 2000 are all based on similar sample aerial surveys. The current estimate is the highest ever recorded in Namibia.



2.5 Geographic trends

Geographic range for elephants has been increasing in Namibia. The current elephant range is probably the largest that it has been in more than a century, with elephants expanding into previously unused or rarely used parts of the Kunene, Erongo, Kavango East and Kavango West regions. The population of Etosha N.P. dates back only to 1950, while the population in Khaudom National Park-Tsumkwe district was founded in the early 1970s (MET data).

2.6 Role of the species in its ecosystem

Elephants indisputably have a significant impact on farming activities and community life that, in the case of land outside protected areas, is of greater importance at present than their broader ecological role in ecosystems shared with people. Conflicts between people and elephants over water and crop damage have severely increased in the past decade, and will become the most serious area of conflict in future. This situation can be counteracted if elephants are perceived to have value to the communities living with them.

2.7 Threats

Elephant habitat in Namibia is prone to serious periodic droughts and is arid or semi-arid in general. The Namibian elephant population, based on historical accounts and direct monitoring has nevertheless managed to increase throughout the previous century despite arid conditions. The principal basis for drought tolerance is the great mobility of elephants in Namibia and knowledge of terrain that allows them to travel long distances between waterholes. It is vital that elephants retain access to range in and out of protected areas and to vital movement corridors, as would only be possible if they are not seen as being incompatible with farming practices. If communities are not able to benefit from the presence of elephants through sustainable utilization, and through trade in ivory recovered from natural mortalities, elephants outside protected areas in Namibia face a serious long-term threat of displacement through progressive range conversion to agriculture.

The Namibian elephant population is secure and viable, and the fact that this population has been recovering throughout the past century in semi-arid habitat indicates its resilience. It is not threatened.

3. Utilization and trade

3.1 National utilization

Namibia has not exploited elephants directly for commercial trade or domestic consumption, except through sport hunting and photo-tourism. Small numbers of elephants were removed in 1983 and 1985 to achieve specifically targeted population reductions for conservation purposes during drought periods in Etosha N.P. All ivory previously traded was an accumulation of ivory originating from natural and management related mortalities, and can thus be seen as a byproduct of effective long-term management. It must be stressed that no elephants have been, or will be, killed specifically to obtain ivory or other products for trade. Ivory is recovered from all recorded natural mortalities as well

as elephants destroyed as problem animals, and strict national legislation makes it obligatory for the public to hand in any ivory found.

Sport hunting (trophy hunting, recreational hunting): The level of sport hunting is largely determined by the 0.5% of standing population guideline (Martin 1986). MET has established a national annual export quota through CITES of 90 trophy hunted elephants per year (180 tusks per year). This quota level was necessary to allow for the possibility that the tusks of elephants hunted in one year may only be exported the following year, as could result from delays in importing countries or the processing of specimens by taxidermists. The actual number exported amounted to 43 (86 tusks) in 2000, 34 (68 tusks) in 2001, 33 (66 tusks) in 2002, 48 (96 tusks) in 2003, 43 (86) in 2004, 48 (96) in 2005, 32 (64) in 2006, 20 (40) in 2007, 81 (162) in 2008, 25 (50) in 2009, 90 (180) in 2010, 48 (96) in 2011, 63 (126) in 2012, 67 (132) in 2013, 52 (104) in 2014 and 53 (106) in 2015.

Leather and hair goods: Namibia currently routinely recover elephant hides from the few cases when elephants are destroyed for management reasons (e.g. problem animal control), as well as from trophy-hunted animals, to maximize benefits that can be re-invested into elephant conservation.

Ivory stocks: The current status (as of 26 April 2016) of the Namibian ivory stocks is summarized in the following table, where natural and management origin refers to ivory obtained from natural mortalities, or from management related practices (i.e. of legal, Namibian origin); seized origin refers to ivory recovered through seizures (i.e. of illegal origin) and unknown refers to items for which no documentation is available:

Origin	Description	Total number	Total weight (kg)	Mean weight (kg)
Natural and Management	Whole tusks	2 638	18 703.15	7.08
	Ivory pieces	1 745	3 222.02	1.85
Sub-total			**21 925.17**	
Seized	Whole tusks	5 459	34 552.73	6.34
	Ivory pieces	322	985.32	3.06
Unknown	Whole tusks	215	1 348.68	6.27
	Ivory pieces	62	70.72	1.14
Total	**Whole tusks**	**8 312**	**54 604.56**	
	Ivory pieces	**2 129**	**4 272.74**	
GRAND TOTAL			**58 877.30**	

All seized or confiscated tusks are separately stored, with some tusks being held on behalf of the Protected Resources Unit of the Namibian Police (PRU) as evidence for pending court proceedings. Growing ivory stocks represent major management, administrative and security problems. Furthermore, ivory in storage declines in quality and value over time, and this represents a major

cost to Namibia. The international conservation community has to take cognizance of this situation and the impasse that conservation agencies find themselves in, in countries where elephant populations have been expanding, where law enforcement is effective and where there is cooperation from the public.

Namibia maintains a detailed computer database of all specimens in storage, with source documentation, and all specimens are marked so as to make them individually recognizable. Namibia has provided to the CITES Secretariat a complete inventory of all stocks of raw ivory each year, before 31 January, as required by Resolution Conf. 10.10 (Rev.), and will continue this practice in future years.

The Namibian ivory stock is growing by 4.5% per year, on average.

3.2 Legal international trade

Namibia conducted legal international trade in ivory since 1985, in 1999 and 2008, as a highly regulated export of 19,870 kg to Japan and China in total. On both occasions the CITES Secretariat confirmed that the trade had taken place successfully, and that there was full compliance with all precautionary undertakings. The revenue obtained from the auctions was deposited in a Trust Fund established though an Act of Parliament, and was used exclusively for projects that benefit elephant conservation directly and to support rural conservation programmes.

3.3 Illegal trade

The incidence of illegal killing of elephants in Namibia is biologically insignificant (Annex 2). Incidents of illegal hunting of elephants in Namibia include cases of illegal shooting before or after elephants have damaged or have threatened to damage crops and farms, and where no attempt is made to collect the ivory. It is nevertheless very difficult to separate illegal hunting with the intent to collect ivory from all hunting incidents, and illegal hunting is notoriously difficult to monitor. Namibia has, however, contributed fully to the system to monitor the illegal trade in ivory and the illegal hunting of elephants, as outlined in the Notification to the Parties 1998/10, and has fully implemented the MIKE system (Monitoring of Illegal Killing of Elephants) at its allocated site.

The incidence of seizures of ivory in Namibia, as communicated also to the CITES Secretariat through the ETIS system, is summarized in Annex 3. The relatively high albeit declining incidence of seized and confiscated ivory in Namibia is not so much evidence of illegal killing within Namibia, as of illegal trade through Namibia. Seizure levels point to successful law enforcement. The numbers of seizures have, nonetheless, declined in the past few years.

3.4 Actual or potential trade impacts

Namibia sees the absence of trade as the greatest threat to elephant populations, stemming from the fact that elephants have in the past had no or very little direct value to rural communities, where so many elephants use land that people also depend on for farming. Elephants will only survive in the long term if they are more valuable to people than their damage to alternative forms of land use, i.e. subsistence farming. The controlled ivory trade will directly benefit the survival of the species as all revenue will be reinvested in elephant conservation in Namibia, including rural community conservation programmes, and monitoring of the impact of trade will be supported.

3.5 Captive breeding or artificial propagation for commercial purposes

Captive breeding plays no role in the conservation of the African elephant.

4. Conservation and Management

4.1 Legal status

4.1.1 National

Elephants are classified as a "Specially Protected" species under the Nature Conservation Ordinance (Ordinance 4 of 1975, as amended) in Namibia. Hunting, capture, transport, being in possession, and trade (import, export, re-export), in raw ivory, live animals and other derivatives are subject to permits and conditions. Ivory and all other parts of an elephant are classified as "Controlled Wildlife Products" under the Controlled Wildlife and Trade Act 9 of

2008. The maximum penalty for contraventions related to trade in Controlled Wildlife Products is N$200 000 (approx. US$13 989) and/or 20 years imprisonment. It is worth noting that we are currently in the process to amend our legislation to increase the fine to N$10 000 000 (approx US$699 300) and/or 40 years imprisonment. On the basis of the Animal Health Act (Act 1 of 2011), the import and transit of raw wildlife products, including ivory, are subject to permits issued by the Veterinary department. The transport of raw wildlife products across national and international veterinary cordon fences requires a veterinary permit. Upon request, health certificates are issued for the export of such products. There is a general policy not to allow import of raw wildlife products from Angola and Zambia, and very strict controls apply to the movement of all biological derivatives and live specimens out of disease control areas.

4.1.2 International

The Namibian elephant population is considered to be secure and increasing by the Ministry of Environment and Tourism. Analogous to the IUCN criteria, the Namibian elephant population would fit into the category of Least Concern. According to the IUCN criteria the continental population has a higher status of Vulnerable.

4.2 Species management

4.2.1 Population monitoring

The Ministry of Environment and Tourism (MET) is responsible for monitoring elephants in protected areas and large parts of their range on communal lands. Aerial surveys have been used to monitor elephant populations in Namibia since the late 1960s, with gradual improvements and expansions until entire populations were covered in the 1970s. All surveys were initially aimed to be total counts, but diminishing funds prior to Independence lead to the use of sample techniques. MET aims, where possible, to survey the entire elephant range every second year, but more frequent estimates of population size are derived for smaller management units or from censuses done for other purposes. Ground-based monitoring is done in all conservancies. Namibia maintains, to our knowledge, the largest road count monitoring system in the world.

4.2.2 Habitat conservation

Almost 17% of the land surface of Namibia has been placed in proclaimed protected areas, including approx. 50% of the national elephant range. An increasing proportion of the elephant range is being incorporated into communal conservancies. A cornerstone of wildlife conservation philosophy in Namibia and other southern African countries is that habitat loss, not trade, ultimately threatens all wildlife outside protected areas, and indirectly also a substantial portion of wildlife inside those areas - unless wildlife becomes more valuable than the land use systems that are threatening to replace them. The entire focus is therefore aimed at protecting elephant (and other wildlife) habitat outside protected areas, by providing people with appropriate incentives and benefits from sustainable utilization of wildlife populations. Concerning elephants, the major forms of resource use will be the selling of trophy hunting quotas, a strictly controlled ivory carving industry using ivory made available from the central government stock and controlled trade in ivory recovered from natural mortalities and problem elephant control.

4.2.3 Management measures

Protected areas in Namibia are strictly managed to ensure minimal disturbance and to ensure the maintenance of biodiversity. Management practices include the supply of water, management of pastures through controlled burning and stocking rates, prevention and control of diseases, research and monitoring of key environmental parameters and the provision of security through anti-poaching work by wildlife protection units.

Conservancies on communal lands operate under the guidance of the Ministry of Environment and Tourism with approved management plans where the requirement that resources are sustainably used is emphasized. Conservancies have to be registered with MET and are supported by MET in wildlife management and utilization, especially concerning population monitoring, quota determination, management plans, marketing and general training.

4.3 Control measures

4.3.1 International trade

Permit control: The MET permit office at Windhoek issues all permits relating to elephants or elephant derivatives. No competencies are delegated to local or regional authorities. (The Directorate of Veterinary Services in Windhoek issues all veterinary permits).

Marking of ivory: All ivory is marked in accordance with Resolution Conf. 10.10, and the marks are included in a database of ivory of known Namibian origin showing the source of each specimen. All specimens of ivory are furthermore marked in a standardized way derived from the domestic permit control system.

Customs and border control: Namibian Customs Officers check CITES, veterinary and transit permits. Where necessary, they refer to the Namibian Police or district veterinary officer. Customs representatives played a key role in supervising the experimental trades of ivory in 1999 and 2008.

Law enforcement: Law enforcement is a joint effort by the Ministry of Environment and Tourism, the Protected Resources Unit of the Namibian Police, and the Customs Service. The incidence of ivory confiscations in Namibia points to effective law enforcement, especially by the Protected Resources Unit of the Namibian Police. Law enforcement agencies rely primarily on information, and well-established informer networks exist and are maintained. This approach has been the most effective in a situation of a low human density and government aiming to remain as small as possible.

Trade controls for raw ivory: Only the Namibian population is included in this proposal. All specimens for export will have been individually marked in accordance with Resolution Conf. 10.10. All other ivory will also be individually marked and registered with the CITES Secretariat to ensure that there can be no mixing of unknown or foreign ivory. All revenue from ivory sales will be used exclusively for elephant conservation and community development and conservation programmes. Namibia will cooperate with neighboring countries in the monitoring of elephant populations and illegal trade, and will assist within its means, credible international organizations involved in such monitoring.

Trade controls for worked ivory: Possession, manufacturing and trade in all elephant specimens are regulated in Namibia. Persons or companies wishing to manufacture or trade worked ivory elephant have to be registered with the Management Authority and are required to maintain comprehensive records of stocks, manufacturing and trade in accordance with Resolution Conf. 10.10.

Trade controls for hides and leather goods: Possession, manufacturing and trade in all elephant specimens are regulated in Namibia. Persons or companies wishing to manufacture or trade elephant hide or leather goods have to be registered with the Management Authority and are required to maintain comprehensive records of origin of stocks, manufacturing and trade.

4.3.2 Domestic Measures

Refer to paragraphs 4.1 and 4.3.1 regarding control measures to ensure sustainable use and management of the elephant population, and preventing illegal trade from impacting on the national population. Standing policy determines that all MET officials must report elephant mortalities and recover ivory. All ivory has to be recorded and marked, and transported to the national stockpile in Windhoek as soon as possible.

5. Information on similar species

Not applicable.

6. References

Craig, G.C. 1999. Aerial census of wildlife in northern Namibia. Ministry of Environment and Tourism official report

Martin, R.B. 1986. Establishment of African ivory export quotas and associated control procedures. Report to CITES Secretariat.

Gibson, D.St.C. & Craig, G.C. 2015. Aerial survey of elephants and other wildlife in Zambezi region September/October 2015. WWF

Gibson, D.St.C. & Craig, G.C. 2015. Aerial survey of wildlife in Khaudom National Park and neighbouring conservancies October 2015. WWF

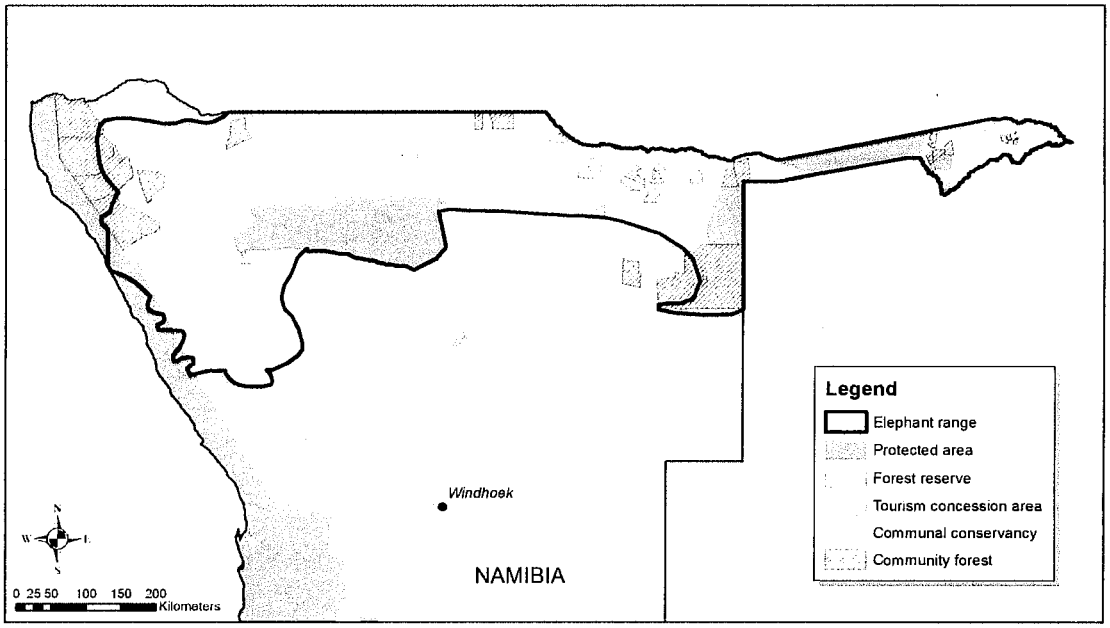
Craig, G.C. & Gibson, D.St.C. 2014. Aerial block count survey of wildlife in North-West Namibia. Ministry of Environment and Tourism, Namibia

Kolberg, H. 2004. Aerial survey of northeast Namibia, 11 August to 19 September 2004. Technical report. Directorate of Scientific Services, Ministry of Environment and Tourism, Namibia

Werner, K. & Kolberg, H. 2004. Aerial survey of Etosha National Park 14 to 25 June 2004. Technical report. Directorate of Scientific Services, Ministry of Environment and Tourism

Werner, K, 2015. Aerial census of Etosha National Park. Ministry of Environment and Tourism report.

FIGURE 1 Map showing the elephant range, protected areas, concessions and conservancies in northern Namibia.



Annotation on the CITES Appendices applying to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe (listed in Appendix II)

"For the exclusive purpose of allowing:

a) trade in hunting trophies for non-commercial purposes;

b) trade in live animals to appropriate and acceptable destinations, as defined in Resolution Conf. 11.20, for Botswana and Zimbabwe and for *in situ* conservation programmes for Namibia and South Africa; c) trade in hides;

d) trade in hair;

e) trade in leather goods for commercial or non-commercial purposes for Botswana, Namibia and South
Africa and for non-commercial purposes for Zimbabwe;

f) trade in individually marked and certified ekipas incorporated in finished jewellery for non-commercial purposes for Namibia and ivory carvings for non-commercial purposes for Zimbabwe;

g) trade in registered raw ivory (for Botswana, Namibia, South Africa and Zimbabwe, whole tusks and pieces) subject to the following:

   i) only registered government-owned stocks, originating in the State (excluding seized ivory and ivory of unknown origin);

   ii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls to ensure that the imported ivory will not be re-exported and will be managed in accordance with all requirements of Resolution Conf. 10.10 (Rev. CoP16) concerning domestic manufacturing and trade;

   iii) not before the Secretariat has verified the prospective importing countries and the registered government-owned stocks;

   iv) raw ivory pursuant to the conditional sale of registered government-owned ivory stocks agreed at CoP12, which are 20,000 kg (Botswana), 10,000 kg (Namibia) and 30,000 kg (South Africa);

   v) in addition to the quantities agreed at CoP12, government-owned ivory from Botswana, Namibia, South Africa and Zimbabwe registered by 31 January 2007 and verified by the Secretariat may be traded and despatched, with the ivory in paragraph g) iv) above, in a single sale per destination under strict supervision of the Secretariat;

   vi) the proceeds of the trade are used exclusively for elephant conservation and community conservation and development programmes within or adjacent to the elephant range; and

   vii) the additional quantities specified in paragraph g) v) above shall be traded only after the Standing
   Committee has agreed that the above conditions have been met; and

h) no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii). In addition such further proposals shall be dealt with in accordance with Decisions 14.77 and 14.78 (Rev. CoP15).

On a proposal from the Secretariat, the Standing Committee can decide to cause this trade to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations.

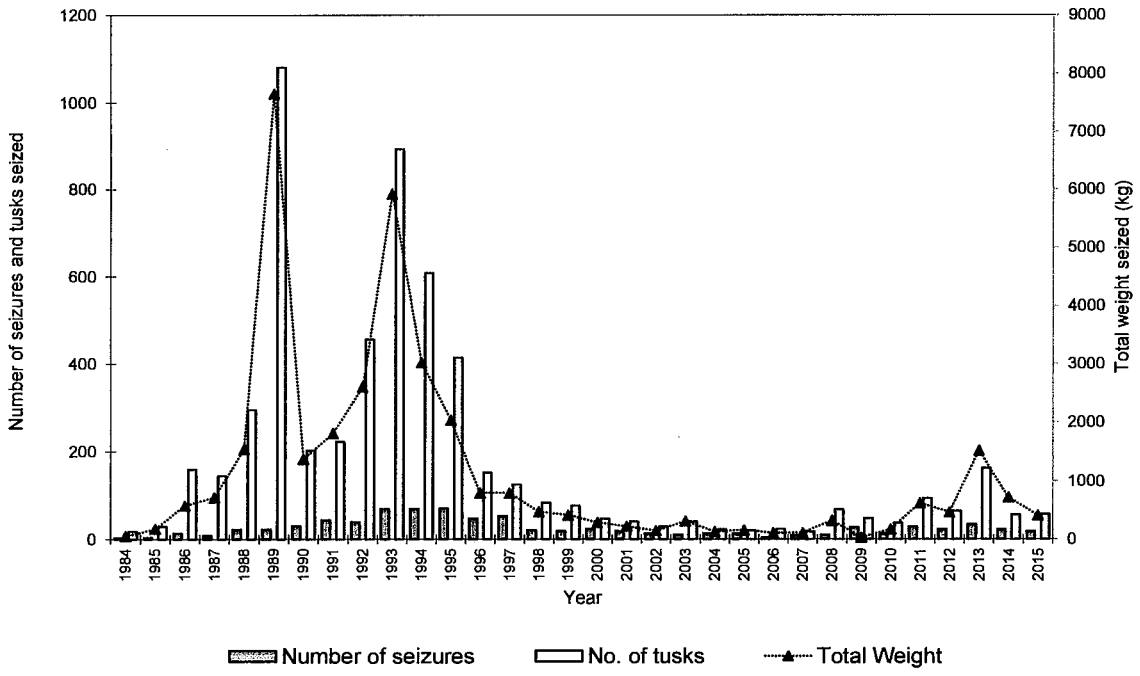
All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly."

Number of elephants killed illegally in Namibia: 1999-current

Year	Total no. of elephants killed illegally
1990	6
1991	1
1992	6
1993	10
1994	7
1995	6
1996	11
1997	4
1998	4
1999	12
2000	2
2001	2
2002	5
2003	7
2004	0
2005	1
2006	0
2007	0
2008	0
2009	0
2010	0
2011	1
2012	78
2013	38
2014	78
2015	49
2016 (until 24 April)	9

Summary of ivory seizures in Namibia: 1984-2015

Year	Number of seizures	Total no. tusks seized	Mean no. of tusks/seizure	Total weight seized (kg)	Mean weight/ seizure (kg)
1984	3	18	6.00	50.30	16.77
1985	4	29	7.25	173.80	43.45
1986	14	160	11.43	573.30	40.95
1987	9	146	16.22	716.00	79.56
1988	22	294	13.36	1544.00	70.18
1989	22	1074	48.82	7609.82	345.90
1990	30	203	6.77	1372.08	45.74
1991	44	222	5.05	1807.46	41.08
1992	40	456	11.40	2596.24	64.91
1993	69	893	12.94	5926.50	85.89
1994	70	611	8.73	3017.64	43.11
1995	71	414	5.83	2028.62	28.57
1996	47	153	3.26	792.79	16.87
1997	53	126	2.38	791.85	14.94
1998	21	84	4.00	467.80	22.28
1999	19	77	4.05	410.50	21.61
2000	24	47	1.96	286.60	11.94
2001	18	41	2.27	219.70	12.21
2002	13	29	2.23	145.10	11.20
2003	10	41	4.10	309.40	30.90
2004	13	22	1.69	125.67	9.67
2005	12	20	1.67	154.20	12.85
2006	4	23	5.75	102.60	25.65
2007	9	17	1.89	108.10	12.01
2008	10	68	6.80	316.45	31.65
2009	27	48	1.78	25.50	0.94
2010	13	38	2.92	166.85	12.83
2011	29	94	3.24	616.07	21.24
2012	22	64	2.91	459.85	20.90
2013	34	163	4.79	1518.68	44.67
2014	22	56	2.55	720.55	32.75
2015	18	57	3.17	405.00	22.50


Number of seizures and tusks seized
Total weight seized (kg)
Year
Number of seizures
No. of tusks
Total Weight

CONSERVATION FORCE

OPERATOR ENHANCEMENT QUESTIONNAIRE

1. **OPERATOR INFORMATION**
   a. Name of Area Operator: S.M.J Safaris
   b. Years in business: 17 years
   c. Name of Company conducting hunt: S.M.J Safaris
   d. City where hunt will take place: Tsumkwe
   e. Country where hunt will take place: Namibia

2. **CONCESSION**
   a. Name of Concession: Nyae-Nyae Conservancy
   b. Area in Km^2: 890 000km2
   c. Land tenure: Nyae-Nyae Conservancy San people
      Government Lease ____ Community x ____ Private Ranch ____ Private Conservancy
   d. Length of Concession Agreement: 5 years
   e. Can it be renewed? Yes x No
   f. Length of Renewal, if applicable:
   g. Estimated total amount received in trophy fees last year, if applicable: US$ 357 900-00
   h. Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:
      We have to hand in annual reports on state of game and habitat status. We have to permanently employ 12 people from local origin. There are numerous programs were we as safari compony has obligations to educate some of the local people as PHs as well as skinners, drivers, and general camp staff. We normally send them to courses that the professional hunters association offer. We have an annual agreement to provide schools in the area with food for the children in the schools. We do antipoaching patrols in association with the conservancy game guards. It is the responsibility of the safari compony to maintain the 17 water points for game in the area. With out these water points the game in the area has no chance to survive. These water points are pumping 355 000 l of water a day for the game in the area.
   i. Please provide the Concession location and nearest City: North-East Namibia / Tsumkwe
   j. Please attach a map or maps with the boundaries marked and showing the nearest City
   k. If the Concession borders a National Park, please provide Park name: Kaudom National Park
   l. Description of general and distinctive habitat features and any water features:
      Genera Savanah with some natural water springs that does dry up during the dry season and then 17 borehole water points that are permanently.

3. **COMMUNITIES IN THE CONCESSION**
   a. Are there any communities living in the Concession? x Yes ____ No
   b. If so, estimated number of people or villages in the Concession? 2500
   c. Are there communities bordering this Concession? x Yes ____ No
   d. If so, estimated number of people or Villages around the Concession? Unknown

4. **RELEVANT GAME POPULATIONS IN THE CONCESSION:**[1]

[1] The new Fish and Wildlife Services (FWS) Import Permit Application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species Name	Relative Abundance			Estimated Population	3-Year Trend			How is it monitored?
	Dense	Avg.	Sparse		Up	Down	Stable	
Elephant	x			2070	x			Research/counts
Lion			x	15	x			Research/counts
Leopard	x			250	x			Research/ counts
Prey species			x	13160	x			Game counts

5. LOCAL COMMUNITY PARTICIPATION

a. Total employment number: _____

b. Please identify the number and type of all employees:

EMPLOYEE TYPE	TOTAL NUMBER OF THIS TYPE	NUMBER OF THIS TYPE WHO ARE LOCAL/FROM NEARBY COMMUNITIES
PROFESSIONAL HUNTERS	3	3
TRACKERS	4	4
ANTI-POACHING SCOUTS/RANGERS	13	13
OTHER ANTI-POACHING		
COOKS/HOUSEKEEPERS	4	4
COMMUNITY COORDINATORS	3	3
MANAGERS	1	1
BIOLOGISTS	5	5
OTHERS: _____		

6. Number of staff employed in the off-season: All staff are permanently employed.

a. Please identify the number and type of staff that are engaged when the season is not open:

EMPLOYEE TYPE	TOTAL NUMBER OF THIS TYPE	NUMBER OF LOCALS /FROM NEARBY COMMUNITIES	WHEN EMPLOYED?
ANTI-POACHING STAFF	13	13	
MANAGERS	1	1	
MAINTENANCE	2	2	
ROAD OPENING /CONSTRUCTION	2	2	
COMMUNITY RELATIONS PERSONNEL	1	1	
OTHERS:			

7. ANTI-POACHING EFFORTS:[2]

a. Number of Anti-Poaching staff: 13

b. Are Anti-Poaching Patrols conducted during the hunting season, off-season, or both?
Hunting season: _____ Off-season: _____ Both seasons: x

c. Months during which Anti-Poaching Patrols are conducted: 12 months

d. Number of Anti-Poaching Patrols per month: 1-5

e. Description of Anti-Poaching equipment, vehicles, etc.:
Vehicles, Bino's and camping equipment as well as personal gear

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution?
MET, Conservancy as well as hunting operator

g. Do you offer rewards to poaching informants leading to arrest? x Yes _____ No

[2] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

7. ANTI-POACHING EFFORTS [*CONTINUATION*]

h. Do you offer rewards to poaching informants upon conviction? x Yes _____ No

i. Please describe the company's anti-poaching expenditures below:

TYPE OF EXPENSE	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
SALARIES FOR ANTI-POACHING SCOUTS	$14000,00	$15600,00	$16000,00	
EQUIPMENT	$10000,00	$10000,00	$10000,00	
VEHICLES		$35000,00		
PETROL	$1200-00	$1200-00	$1200-00	
REWARDS PAID				Poaching is very low in the area
OTHER: _____				
OTHER: _____				
TOTALS	$25200-00	$51800-00	$27200-00	

j. What currency are the expenditures given in? US$

8. ANTI-POACHING RESULTS:

CATEGORY	2016	2017	2018	REMARKS
POACHING INCIDENTS DISCOVERED	1	3	2	
ELEPHANT CARCASSES OBSERVED	0	0	0	
LION CARCASSES OBSERVED	0	0	0	
LEOPARD CARCASSES OBSERVED	0	0	0	
IVORY POACHERS ARRESTED	0	0	0	
MEAT POACHERS ARRESTED	0	4	2	
OTHER POACHERS ARRESTED	0	0	0	
POACHERS CONVICTED	0	0	0	
SNARES/GIN TRAPS COLLECTED	3	5	2	
FIREARMS CONFISCATED	0	0	0	
VEHICLES CONFISCATED	0	0	0	
BICYCLES CONFISCATED	0	0	0	
BOATS/NETS CONFISCATED	0	0	0	
TUSKS RECOVERED	0	0	0	
OTHER: _____				

9. COMMUNITY INVESTMENT:[3]

a. Does the Company contribute money or goods/services to local communities?
x Yes ____ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
50% of total income goes to local communities. Recuired by contract

c. Does the Company provide game meat to nearby communities? Yes x No ____

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:
All the meat hunted goes to the comminuties and this adds up to about 45 tons per season to estimate a value would be very difficult as elephant meat has not got a value on the open market as we cannot sell it. At normal game meat prizes this will add up to $ 75 000-00 per year

e. If the Company performs problem animal activities for surrounding communities (e.g.: patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.
We very seldomly gets PAC animals

f. Please describe any consolation payments made to local residents damaged by game species

g. What currency are the expenditures reported in? USD$

SPECIES	DAMAGE CAUSED	CONSOLATION PAID 2016	CONSOLATION PAID 2017	CONSOLATION PAID 2018
ELEPHANT				
LION				
LEOPARD				
OTHER				

a. Please describe any community projects paid for by the Company:
Most of the community programs are run by the conservancy trough the money earned from trophy hunting. There a lot of them climate change, sustainable usage, cattle breeding, family planning but to mention a few . The safari compony does provide it's workers with courses every three years that has direct needs in the safari compony, like PH's schooling housekeeping skinning vehicle maintenance and cooking courses

b. What currency are the expenditures reported in? As these project are run by the conservancy we cannot give an amount on them, from the compony side we have to spend $3500-00 every three years on training.

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
EDUCATION (E.G.: CLASSROOMS, OFFICES)				

[3] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

EDUCATION (E.G.: SCHOOL FEES, SCHOOL SUPPLIES)				
HEALTH (E.G.: CLINICS, OFFICES)				
HEALTH (E.G.: MEDICAL SALARIES, EQUIPMENT)				
COMMUNITY SCOUT SALARIES				
OTHER COMMUNITY ANTI-POACHING				

9. COMMUNITY INVESTMENT [*CONTINUATION*]

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
LOCAL GOVERNMENT ACTIVITIES				
WATER INFRASTRUCTURE IMPROVEMENTS				
SPORTS TEAMS FUNDED				
CONSTRUCTION MATERIALS DONATED				
OTHER:				
OTHER:				
TOTALS				

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	HUNTING ELEPHANT		HUNTING LION		HUNTING LEOPARD		HUNTING CAT SPECIES	
NUMBER OF U.S. CLIENTS	**2016:**	1	**2016:**	0	**2016:**	1	**2016:**	3
	2017:	6	**2017:**	0	**2017:**	2	**2017:**	10
	2018:	3	**2018:**	0	**2018:**	1	**2018:**	4
PERCENTAGE OF U.S. CLIENTS	**2016:**	20%	**2016:**	0	**2016:**	35%	**2016:**	10%
	2017:	80%	**2017:**	0	**2017:**	65%	**2017:**	80%
	2018:	40%	**2018:**	0	**2018:**	35%	**2018:**	25%
TROPHY FEES PAID BY U.S. CLIENTS	**2016:**	$45000	**2016:**	0	**2016:**	$7000	**2016:**	$5500
	2017:	$245000	**2017:**	0	**2017:**	$14000	**2017:**	$25000
	2018:	$100000	**2018:**	0	**2018:**	$$7000	**2018:**	$12000

11. Approximate Dollar amount and/or percentage of Company's revenue from U.S. Clients: $450 000-00
45%

12. OTHER INFORMATION: Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies (e.g., aging, size, resting areas), Concession Improvements (e.g.: digging and maintaining boreholes, restocking), Management Activities, Research, etc.

We have very strict hunting laws in the area that does not allow you to shoot close waterholes or roads nor from vehicles and also only during legal hunting times. Since we have taken over the hole area in 2017 we have fixed up all the game water points in the area which before the time only 20% of them were in working order. All village water points are maintained by the conservancy and even 5 new boreholes were made in the last few years. Community members not only get the meat from the meat distribution plan that we have in place but also gets about $200 000,00 payed out straight to them in cash from the moneys received from trophy hunting.

We in the area has picked up that from there has been issues with the importation of ivory from the Namibia to the USA our USA client base has really declined.

13. I declare that the foregoing is true and correct:

Nyae Nyae Conservancy
CONSERVANCY NAME

TELEPHONE: +264 811 288053

EMAIL: SMSG@iway.na

S.M. Jacobs
OPERATOR – FULL NAME (PLEASE PRINT)

Owner
TITLE

SIGNATURE

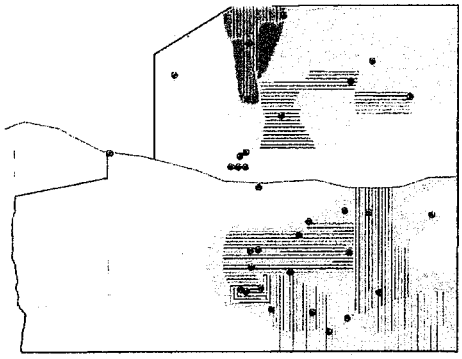
nndf.org
CONSERVANCY WEBSITE

DRAFT

GAME COUNTS – LINE TRANSECTS

NYAE NYAE CONSERVANCY Jul/Aug 2019

Line Transects:

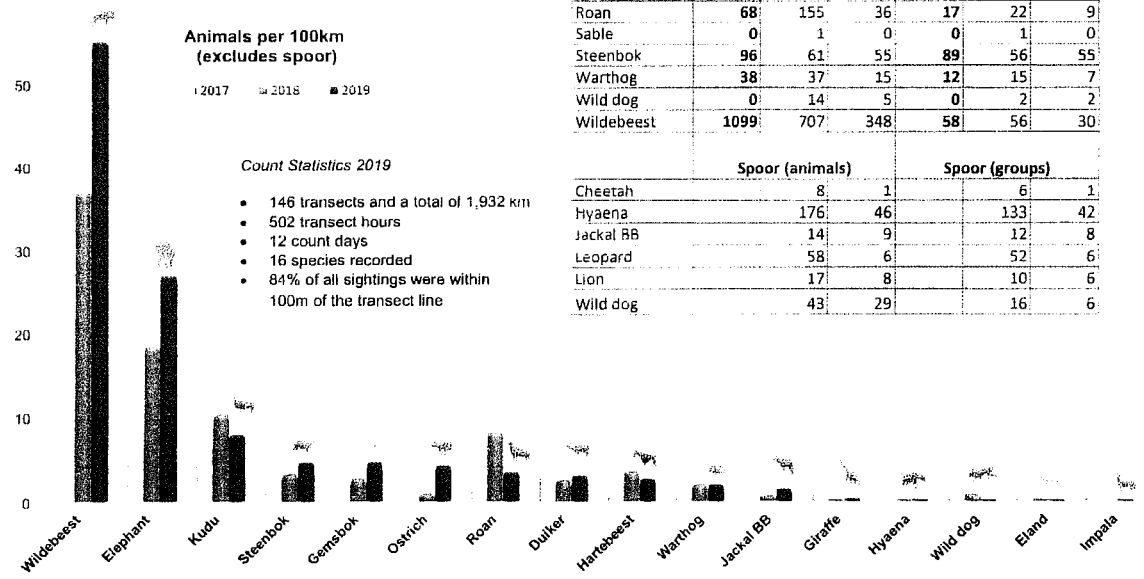


Area represented = 420,000 ha.

Animals seen

Species	Animals Seen 2019	2018	2017	Groups seen 2019	2018	2017
African Wild Cat	1	0	0	1	0	0
Duiker	59	47	51	58	44	48
Eland	0	2	5	0	2	1
Elephant	537	251	91	75	68	39
Gemsbok	92	51	122	25	17	23
Giraffe	4	2	16	3	1	4
Hartebeest	51	67	16	7	8	3
Hyaena	1	1	2	1	1	2
Impala	0	0	6	0	0	2
Jackal BB	28	11	6	12	8	6
Kudu	157	196	108	50	50	33
Lion	1	0	0	1	0	0
Ostrich	84	16	32	30	9	13
Porcupine	4	0	0	3	0	0
Roan	68	155	36	17	22	9
Sable	0	1	0	0	1	0
Steenbok	96	61	55	89	56	55
Warthog	38	37	15	12	15	7
Wild dog	0	14	5	0	2	2
Wildebeest	1099	707	348	58	56	30

Species	Spoor (animals) 2019	2018	Spoor (groups) 2019	2018
Cheetah	8	1	6	1
Hyaena	176	46	133	42
Jackal BB	14	9	12	8
Leopard	58	6	52	6
Lion	17	8	10	6
Wild dog	43	29	16	6



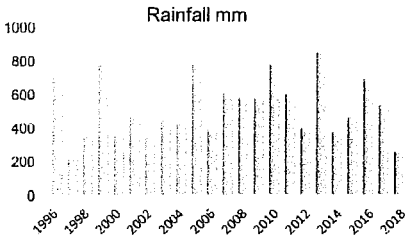
Count Statistics 2019

- 146 transects and a total of 1,932 km
- 502 transect hours
- 12 count days
- 16 species recorded
- 84% of all sightings were within 100m of the transect line

Estimates

Species	Estimate	95% CL Low	95% CL High	Model
Duiker	1,030	660	1,620	HN
Elephant	2,070	1,280	3,350	HN
Gemsbok	680	365	1,280	HN
Hartebeest	300	140	750	U
Kudu	1,455	980	2,160	HN
Ostrich	280	145	540	U
Roan	650	320	1,300	U
Steenbok	2,195	1,590	3,035	HN
Warthog	185	100	350	U
Wildebeest	5,185	3,280	8,200	U

Estimates (rounded) were derived using DISTANCE analysis which takes account of drop-off in animal detectability with distance from the transect line. Ten species had sufficient sightings to adequately derive species detection curves and therefore produce estimates. Model. U=uniform; HN=half normal.



Synopsis

Line transects were started in 2017 and represent almost half of the total area of the conservancy and include most of the waterholes. The area not covered by transects has low animal densities due to reduced habitat suitability and people pressure.

Transect counts have recorded 22 species including 6 predator species. Based on spoor sightings hyaena are the most common predator, followed by leopard and wild dog.

The top 3 species in terms of sightings between 2017 and 2019 included wildebeest, elephant and kudu.

Nyae Nyae wins conservation award

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NEXT TO GODLINESS ... Ignatious Jingura sorts out discarded obsolete electronic gadgets at the electronic waste management company in Windhoek. He said in line with the launch of this year's national clean up campaign by environment minister Pohamba Shifeta in April which is scheduled for September, as well as the recent Windhoek municipality's recent clean-up campaign, people should always ensure they get rid of waste from their environment everyday. Photo: Contributed.

STEVE FELTON

NAMIBIA'S oldest conservancy, Nyae Nyae, was awarded the prestigious Edmond Blanc prize at an event held at the Safari Court Hotel in Windhoek on Saturday.

The International Council for Game and Wildlife Conservation (CIC) awards the prize for outstanding efforts in wildlife conservation and game management.

In the words of the CIC: "Only those game reserves, and game organisations that have had outstanding success in their work to conserve [the] natural environment, to protect free-roaming animals in the wild and to manage game according to principles of sustainability shall be eligible for the Edmond Blanc prize."

The prize was awarded to Nyae Nyae Conservancy and stakeholders, including professional hunter Stephan Jacobs of SMJ Safaris and the Ministry of Environment and Tourism.

It was presented to chief Tsamkxao ≠Oma, who explained traditional hunting methods to the modern trophy hunters gathered from around the world.

"We hunt without noise," he said. "In the past we would track an animal and then stay with it until the meat was finished. But this would chase other animals away, because of our smell."

Wishing to conserve and keep wildlife in the conservancy, the chief said they have created large hunting areas, away from the villages, to sustain wildlife for generations to come.

Referring to the changes since the conservancy was formed in 1998, the chief said that hunting is now done according to quotas set by the Ministry of Environment and Tourism based upon game counts.

Traditionally the San people only hunted what they needed to eat, said Tsamkxao ≠Oma, and the quota system also ensures that game is conserved.

In motivating the prize for Nyae Nyae, Rolf Baldus, a German economist who has published widely on conservation issues, said Nyae Nyae, located in the so-called Bushmanland in the north-east of Namibia, covers an area of approximately 900 000 hectares of wilderness, which is rarely found in Africa today.

"Sustainable hunting is one way to conserve and carefully develop [San] culture," writes Baldus. "It promotes wildlife conservation with clear measurable results through sustainable use of wildlife," and: "Through community involvement ... it has combated wildlife crime and continues to do so."

Poaching in the area is at a very low level.

Stephan Jacobs is the current professional hunter contracted by Nyae Nyae conservancy.

In a brief history of conservation hunting in Nyae Nyae, he stated that in 1970 there were no elephants in the area. They first migrated from the Zambezi area in 1971, and when the legendary hunter Volker Grellmann obtained the first hunting concession in the area, there were 80-100 bull elephants in Nyae Nyae.

Today there are between 1 500 and 2 000 elephants in the conservancy, according to Jacobs.

The hunter went on to state that conservation hunting actively conserves wildlife, and that plains game and lion numbers have increased dramatically in Nyae Nyae.

Modern hunting of game, including buffalo and a quota of nine elephants in 2019, is done with rifles, but tracking is still done on foot using the skills of San trackers who cover up to 30 kilometres a day.

Employment of trackers is one of the benefits of conservation hunting. Others include the employment of conservancy rangers and cash benefits to what was one of the poorest communities in Namibia, said Jacobs.

Almost all of the N$2 million paid out to conservancy members in each of the last two years comes from conservation hunting, which

also pays for water holes for game.

Meat for the community is also a vital benefit of sustainable hunting for a poor community, he said, with 30 tonnes being distributed.

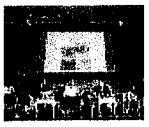
Namibia, in its presentation to the CITES convention later this year, will argue that the sustainable use of wildlife brings financial and social benefits to rural communities and conservation benefits to wildlife.

In motivating the Edmond Blanc prize, Dr Baldus stated that Nyae Nyae "has followed strictly all Cites rules and fulfils fully the expectations of Cites that hunting protected species contributes to their conservation."

Edmond Blanc Prize Awarded to the Nyae Nyae Conservancy and Stakeholders 10 May 2019

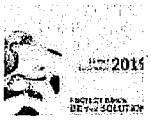
The Edmond Blanc Prize awards outstanding efforts in wildlife conservation and game management that are based on the principles of

CIC VIDEO CHANNEL



Social media – Friend or Enemy of Conservation
15 May 2019

How hunting saves wildlife – Second part
15 May 2019



World Migratory Bird Day 2019
11 May 2019

Hungary joins the 1 Euro per Hunter Initiative
5 May 2019

Opening Ceremony – Crossroads – Leading the Way for

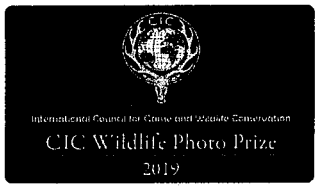
sustainable wildlife use. The International Council for Game and Wildlife Conservation (CIC) has been awarding game reserves, conservation associations and organizations since 1928, choosing one area every second year, honoring those that have had outstanding success in their work to conserve the natural environment, to protect free-roaming animals in the wild and to manage game according to principles of sustainability. During the closing ceremony of this year's 66th General Assembly, Namibia, the Edmond Blanc Prize was given to the Nyae Nyae Conservancy and Stakeholders, and was awarded to Stephan Jacobs for their work as professional hunters within the conservancy. A short dance was performed on stage to commemorate the occasion, which was followed by Chief Tsamkxao ≠Oma of the Nyae Nyae conservancy giving his thoughts as the Chief Bobo. He spoke of the changes since the creation of the conservancy, with particular mentions to the use of designated areas specifically for the purposes of hunting. Nyae Nyae's dedication to the use of modern hunting practices, and their adoption of hunting regulations and quotas, was also highlighted.

TWEETS

Tweets by @CICwildlife

CIC
@CICwildlife

#photoprize The theme of the 2019 photo prize is "Wildlife up close". Deadline: 28 February 2019. Applications to photo@cic-wildlife.org



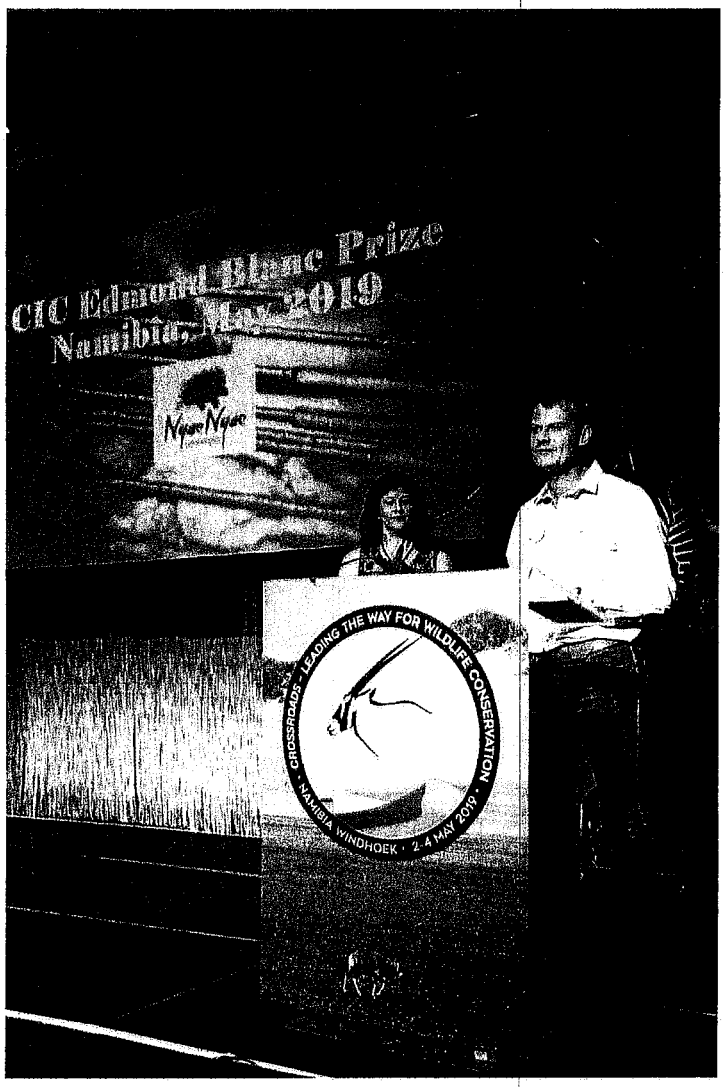
Jan 22, 2019

CIC
@CICwildlife

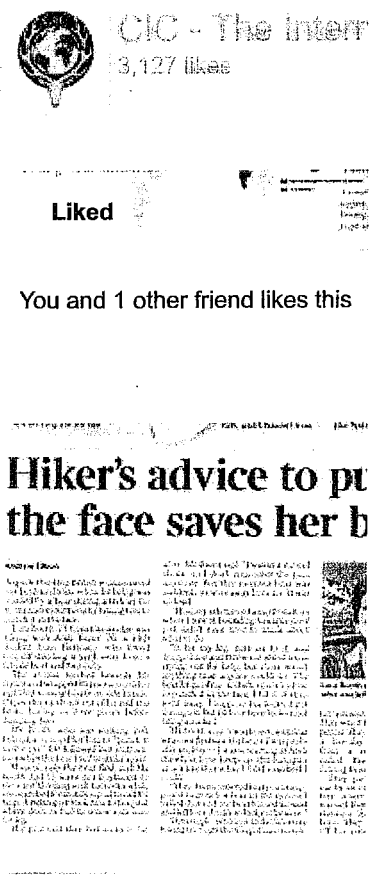
This year's #MarkhorAward winner is the 'Return of Rural Wetlands LIFE+ Project'! Congratulations! #conservation #wildlife

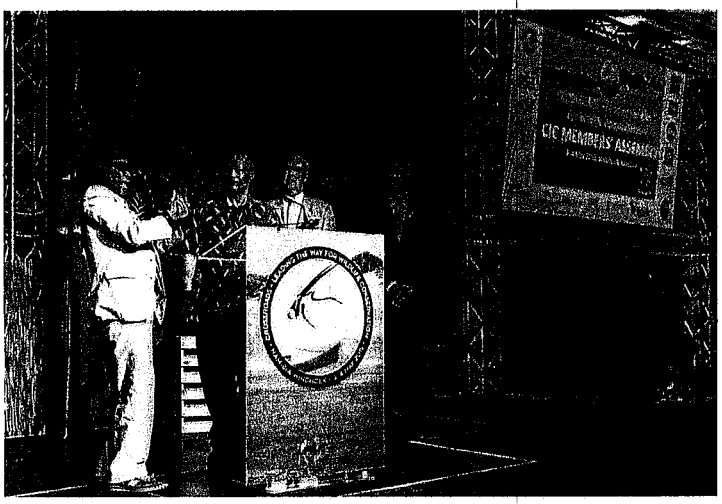
Embed View on Twitter

FACEBOOK



Stephan Jacobs then took the stage to give a statement on his experience as a professional hunter at the Nyae Nyae conservancy. He opened by stating the huge difference in elephant numbers, as well as lions and plains game, since the introduction of the conservancy in 1998; elephant numbers were estimated to be between 80-100 in 1978, with the current elephant population numbering between 1500 and 2000. Supplying water to these elephants was noted as one of their most significant achievements, with the average elephant bull consuming 250l of water a day.





The contributions of trophy hunting and what is has achieved for Nyae Nyae were emphasized, which includes providing 85% of the conservancy's income, funding a number projects including a cash benefit (in 2017/18 more than 2 million Namibian dollars was given to conservancy members as cash benefits). Meat distribution, totaling more than 50 tonnes of meat per year, and job opportunities were regarded as additional benefits.

Mr. Jacobs also stressed the importance of the Sun people, who provide knowledge of traditional hunting techniques (such as tracking) and how to coexist with wildlife when living amongst them. He gave an overview of a typical day in his life as a professional hunter, which includes tracking and identifying elephants that are suitable to be hunted – on average they look through 80-100 elephant bulls before finding one sufficient in size, age and other characteristics.

Achievements of the Nyae Nyae Conservancy

Nyae Nyae was considered for this prize on the basis of their outstanding achievements in conservation, fulfilling multiple criteria set out by the CIC. Their work in the sustainable use of wildlife has yielded clear and measurable results through an increase in the number of wildlife, particularly in the restoration of elephant numbers in the conservancy. Aggregating data from aerial surveys, moonlight waterhole and foot transect counts, it was found that elephant numbers have increased at an average rate of 3.0% per year between 1998 and 2015. Much of this is due to the work that Stephan and his team have done in the creation of new boreholes that provide water to elephants – water can be considered a limiting factor to elephant population growth in this arid area.

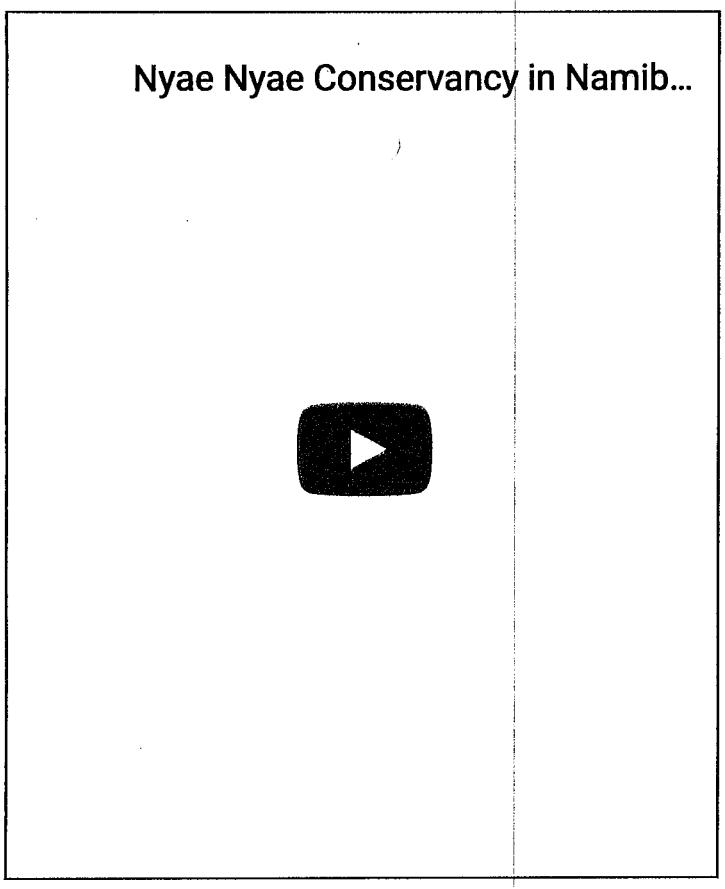
Their approach to community involvement in conservation was also commended. The model, which incorporates ideas of community based natural resource management, shifted the majority of revenues to the local San people. Nyae Nyae's community led approach gave local

community members a reason to care about wildlife, and provided the San people with employment opportunities. Stephen works closely with the San on hunts, making good use of their tracking abilities. In addition, the San's involvement in anti-poaching measures has led to the control of general poaching within the conservancy.

Their dedication to conducting responsible hunting was recognized as a further achievement by the CIC. Nyae Nyae has consistently elected professional hunters, acting as lease-holders for a five year period in the conservancy, that have shown their ability to successfully manage the conservational and socio-economic responsibilities associated with the role. In regards to their methodology when it comes to hunting, much care goes into choosing animals with the suitable characteristics. For the case of elephants, only older, post-productive elephant bulls are selected for this purpose. The hunting results of recent years are also impressive; the average weights of the tusks of all trophies were consistently well over 70 lbs with a positive, upwards trend – this is unmatched in Africa today.

The CIC would like to congratulate Mr and Mrs. Jacobs, as well as the Nyae Nyae Conservancy and stakeholders, on this achievement and we hope that their work can inspire others in the

sustainable wildlife use community to work towards even greater successes going forward.



LEAVE A REPLY

Your email address will not be published. Required fields are marked *

Name*

Email*

Form 3-200-19

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

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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Whitworth	Jared	Wayne	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Hardinsburg	KY	40143	Breckinridge	U.S.A.
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].
2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 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)
   [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. 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~~ Elephant (~~*Panthera pardus*~~ Loxodonta Africana) Quantity: 1 (~~Limited to the import of two per calendar year~~). If you wish to import a ~~leopard~~ elephant taken in ~~northern or western~~ South 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 Reserv
   Hoedspruit

   e. Date wildlife was hunted: May 26th 2018 to June 07th 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 und[redacted]ard trophies in one calendar year.

Applicant's signature (b) (6) 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

NEMA Act 57 of 2003

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

DEPARTMENT OF ECONOMIC DEVELOPMENT ENVIRONMENT & TOURISM
POLOKWANE PERMIT OFFICE
CAPRICORN DISTRICT
PERMIT NUMBER: 0 № 4686
2017 -10- 23

NAME	PRIVATE BAG X 9565
ADDRESS	POLOKWANE 0700
	LIMPOPO PROVINCE
PROVINCE	

DETAILS OF PERMIT HOLDER

NAME	Cecil Coningham	ID NO.	6201175185059
SURNAME	Cecil Coningham	PASSPORT NO.	
	POSTAL ADDRESS		RESIDENTIAL ADDRESS
ADDRESS	POLOKWANE PERMIT OFFICE		7 Aluminium Road
ADDRESS	CAPRICORN DISTRICT		White River 1240
ADDRESS	2017 -10- 23		White River
TOWN			1240
POSTAL CODE	PRIVATE BAG X 9565		Mpumalanga
PROVINCE	POLOKWANE 0700 LIMPOPO PROVINCE		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	Cecil Coningham
NAME AND SURNAME: RESPONSIBLE PERSON	Cecil Coningham
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Life-Form Taxidermy
PHYSICAL ADDRESS OF FACILITY	White River 1240
DISTRICT	
PROVINCE	
REGISTERED NAME AND NUMBER (in the case of game farm)	

(b30)

DETAILS OF SPECIES INVOLVED

SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(if known)		(if applicable)
Hunting trophies locked in terms of TOP's & LEMA.				

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Import & Convey hunting trophies from other provinces to a Taxidermy. Export Sell legally obtained hunting Trophies convey & export Young's other provinces to Shipping agencies in other provinces

NAME AND SURNAME OF PURCHASER/SELLER	
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	

DEPARTMENT OF ECONOMIC DEVELOPMENT ENVIRONMENT & TOURISM
POLOKWANE PERMIT OFFICE
CAPRICORN DISTRICT
2017 -10- 23

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:	
NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:	
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	
WEAPON AND METHOD OF HUNTING	

PRIVATE BAG X 9565
POLOKWANE 0700
LIMPOPO PROVINCE

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	1096546, CR100-00		
			(b) (6)
SIGNATURE OF ISSUING OFFICER:		SI	
DATE STAMP:			

DTE001

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.

ENVIRONMENT & TOURISM
PROVINCIAL PERMIT OFFICE
CAPRICORN DISTRICT
2017 -10- 26
PRIVATE BAG X 9566
POLOKWANE 0700
LIMPOPO PROVINCE

Permit Officer

Date

(b) (6)

26/10/2017
Date

Permit in	Permit out

DEPARTMENT OF AGRICULTURE

MPUMALANGA

Permit number: ORAEN 72/0009/2019

DEPT. LANDBOU

UMKO LETEKULIMA

VETERINARY PERMIT TO MOVE ANIMALS / ANIMAL PRODUCTS
VEEARTSENYPERMIT VIR VERVOER VAN DIERE / DIEREPRODUKTE
IMVUMO YEKUHAMBISA TILWANE / TINTFO LETIHABULISANO TETULWANE

In terms of the Animal Diseases Act No. 35 of 1984 permission is hereby granted to:
Kragtens die Wet op Dieresiektes Nr. 35 van 1984 word toestemming hiermee verleen aan:
Ngaligunya kaMtsetfo waTfo teTiwena No. 35 wa 1984:

Name: Naam: Libito:	Zwelie Mgwenya	ID No.:	(b) (6)
Address: Adres: Likheli:	Life form Trademy White River		

to move with: om te beweeg met: umunyelwe yekuhambisa:	AMOUNT / HOOFDS: Fifteen (15)	SPECIES: Elephant	LIVE / PRODUCT: Trophies
identified as follows: geidentifiseer as volg: Iticondzisiwe nga:	Tusks x2, 4 feet, Pones, Head, 2x ears & Trunk		
from the farm/diptank/ area/place: vanaf die plaas/dipbak/gebied/plek: lesuka epulazini/edibhini/endzaweni:	Unfenced park	STOCK CARD NUMBER	in the district of: in die distrik: esigodzini sase: Bohlabela
to the farm/diptank/ area/place: na die plaas/dipbak/gebied/plek: lasya epulazini/edibhini/endzaweni:	Life form White River		in the district of: in die distrik: esigodzini sase: Ehlanzeni

On the following conditions:
1. This permit:
(a) is valid for 10 days from date of issue and for one consignment only
(b) must accompany the animals / products mentioned above;
(c) must be produced for inspection on demand by any land or animal owner or police or veterinary official;
(d) must be kept at a destination until collected by a veterinary official.
2. For game / game products a nature 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 voorwaardes:
1. Hierdie permit:
(a) is geldig vir 10 dae vanaf datum van uitreiking en slegs vir een besending;
(b) moet die diere / produkte hierbo vermeld vergesel;
(c) moet vir inspeksie getoon word op aanvraag van enige grond- of dieremeester of polisie- of veeartsenyamptenaar;
(d) moet by bestemming gehou word totdat dit deur 'n veeartsenyamptenaar gemerk word.
2. Vir wild / wildsprodukte word 'n natuurbewaringspermit ook benodig.
3. Diere en produkte moet sigbaar vry van eksterlike parasiete wees.
4. Diere moet volgens dierewelsynsriglyne vervoer word.
5. Ander voorwaardes:

Ngaphansi kwemibandela lelandzelako ngaphansi:
1. Lemvumo:
(a) lisebenta emalanga langu 10 kusuka kulolusuku lwekukhishwa kwaso futsi lisebentela kuphela lingo;
(b) kufanele kuhambisane netilwane / timatjuleli letishiwo lapha ngenhla;
(c) kufanele kukhonjiswe nanyatsi nawuphi umuntu wemnini wemhlaba wemfuyo noma wemaphoyisa noma kutfolamiselo lwetilwane;
(d) kufanele kugcinwe yatfolwa indzawo lapho kuyiwa khona kuze kutsatfwe nguloyo lotsatfwa kutfolamiselo lwetilwane.
2. Kudzingeka lemvumo yekulondvolota budzingela / timatjuleli letibulawako letinhlanyelo temvelo yelilanga lenkhulu.
3. Tilwane letibulawako kufanele tingabi nawo Tonkhe tinhlobo tetinyamatane letingaphandle kwemtimba.
4. Tilwane kufanele tithuthwe ngaphansi kwemitsetfo lelawula kuphatfwa kwetilwane.
5. Letinye timiso lelingako:

Transported in Lemage proof Container directly to the Quarantine Station at Life form Tradamy White River

6. Retention for / Quarantine for / Direct slaughter within: ____ days after arrival at destination

Seal no/s:		Fence / Fiek / Indlanga:	Control gate
Vehicle reg. no/s:	HCD 922MP	Date / Datum / Lidvuto:	01/06/2018

I hereby certify that all applicable conditions for issuing of this permit have been complied with.
PRINT NAME: Mahumane D.H
SIGNATURE
Issuing Veterinary Official: Veearts / Veearts / Umfundisi wa Tilwane

IMPORTANT NOTE / BELANGRIKE NOTA / SATSEKISISEKILE
Permit holder who does not comply with this permit or any condition thereof is guilty of an offence.
Permithouer wat nie aan enige deel hiervan voldoen nie, is skuldig aan 'n misdryf.
Lomnikemuso longakalandzeli lomcitsa kwaphi nakwenye kwalo kuphula umtsetfo.

DISTRIBUTION:

Chief Directorate: Veterinary Services
2018 -06- 01
State Veterinary Office: Open
Klaserie Ward
PROVINCE OF MPUMALANGA

DATE STAMP
0009
2018 -06- 01
State Veterinary Office: Open
Klaserie Ward
PROVINCE OF MPUMALANGA

Mpumalanga
TOURISM AND PARKS AGENCY

Private Bag X11338,
Nelspruit, 1200
21/02/2018

Umbabat Private Nature Reserve
Hoedspruit
1380

RE: Comments: Proposed 2018 offtakes in Umbabat PNR complex

The approval of the animal offtakes for 2018/19 season, listed in a letter (dd 09/12/2017) from Dr. Peel wrt game removals 2018 in APNR v6, refer.

The proposed quotas, 2017 aerial census data, and table with some calculations on the various species populations in these letters, formed the base of the evaluation of the proposed offtakes. On request, the results of your predator counts were forwarded, indicating that 17 lion and 38 hyena were recorded. It is noted that the hyena count is regarded as conservative.

The proposed offtake levels are regarded as sustainable. The efforts to improve the demographic studies on several species are welcomed.

From a wildlife management perspective, the proposed levels of removal as indicated in Table 1 is supported, as long as it takes place within the legal framework that is in place. This includes the relevant legislation, norms and standards and veterinary regulations.

Mpumalanga
TOURISM AND PARKS AGENCY

Table 1: Umbabat PNR complex proposed offtakes 2018

Species	Category	Commercial	Non-Commercial
Elephant Bulls	+50 years	1	0
	30-40 years; 40lbs/side	2	0
	20-30 years; 30lbs/side	1	0
Buffalo	Bulls Classic >12y	1	0
	Bulls Management <34"	5	0
	Cows	4	0
Kudu	Bulls	1	4
Impala	Any	0	336
Lion	Male: >5 years old	1	0
Hyena	Endeavour to hunt males	3	0

Regards

J.J. EKSTEEN
Manager Scientific Services
Date: 21 February 2018

Management Authority, FWHQ <managementauthority@fws.gov>

[EXTERNAL] PRT identification number: MA97814C-0

1 message

Jared Whitworth (b) (6) Thu, Mar 7, 2019 at 4:07 PM
To: managementauthority@fws.gov

Division Of Management Authority,

I am sending this supplemental information with the hope that it will help in my request for PRT identification number: MA97814C-0 Elephant Permit. I have attached document 18.Umbabat Quota MTPA that show a census was completed to allow for the removal of the Elephant. I have also attached Letter to Jared Whitworth which talks about how the money, that I spent for this animal, is being used for conservation efforts to control poaching. I appreciate your help in obtaining this permit.

2 attachments

Letter to Jared Whitworth - 5 March 19.pdf
156K

18.Umbabat Quota MTPA.pdf
307K

UMBABAT

5 March 2019

Attention: Mr Jared Whitworth

Re: Elephant Hunt within the Umbabat Private Nature Reserve – 2018

Dear Mr Whitworth,

The Umbabat Private Nature Reserves annually conducts commercial hunts, with international clients predominantly from USA and Europe. These hunts occur via Outfitters, in your case Graham Sales Outfitter.

In response to your query on allocation of funds received from these hunts, we'd like to confirm that 100% of the funds received return to the Reserve.

There are a few expenses that the reserve encounters in order to facilitate the hunts, for instance, accommodation, Reserve Representative appointment and tips for the camp and skinning staff.

All the remaining funds allocate towards the running of the Reserve. Those expenses predominantly Anti-Poaching forces and game security (about 60%) and Wardenship and Specialist studies (40%). There is a growing legal expense the Reserve is encountering on an annual basis, essentially incurred by conformity to the demands for good governance.

I'd like to assure you that no member's of the Executive committee receive any financial benefit of any kind in return for the administration of the reserve.

The executive committee of the Reserve facilitates the application hunting process in the following manner: the approval of the expenditure to conduct census's, specialist studies and reports, appointment of appropriate anti-poaching forces, ensuring Reserve compliance with the Hunting Protocol, submissions to Kruger National Park (the Reserves neighbours) and the Nationally appointed authority (Mpumalanga Parks and Tourism Agency (MTPA) in the Umbabat's case), with specific reference to off-take requests, adjustments thereto and finally approval thereof by the MTPA – the permit issuing authority. The expenses are incurred since the Reserve subscribes to the principal of "best practice".

Attached, please find a copy of the approval of the Umbabat Hunting quota for the 2018, received from the MTPA. The MTPA is a government department, whom has authority delegated to it in terms of the legislation of South Africa and the Department of Environmental Affairs – we sincerely hope this letter assists with the importation of your trophies into the USA.

At the time of (2018), and the year preceding (2017) your hunting in the Umbabat Reserve, I was the Chairman of the Reserves Executive committee, and as such feel it appropriate that I respond to your query and request.

I am still an executive member, i.e. Vice-chairman.

Kindest regards,

Lenny Willson Vice-chairman

Umbabat Private Nature Reserve

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 2 2 2018

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

Type of Activity:
Import of Sport-hunted Trophies 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
WASIF HASAN LATEEF	WASIF HASAN LATEEF		

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Westlake Village	CA	91362	Ventura County	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature (photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 05/30/2018

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: 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 Name:	Trophy Consultants International (T.C.I.)(Formerly - Taxidermy Enterprises (Pvt) Ltd).
Address:	4 Josiah Chinamano Road,
City:	Belmont,
State/Province:	Bulawayo,
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. 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: 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 Hasan Lateef
(b) (6) Westlake Village, CA-91362,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 Hasan 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.

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Wed, Oct 2, 2019 at 10:47 AM
To: (b) (6)

Wasif:

U.S. Fish and Wildlife Service Prt # 97874C

On 06/22/2018 an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt #97874C**. At the me of the applic aon' s submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] Re: Elephant Withdrawal Inquiry

1 message

ashar lateef <(b) (6) Thu, Oct 3, 2019 at 3:33 AM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>

Dear officer,

Thank you for your email.

Yes, I have hunted my elephant successfully and eagerly awaiting my import permit, the required details are provided below.

1) Dates of hunt – 19 March 2018 to 29 March 2018
2) Date Elephant shot – 23 March 2019
3) Concession where Elephant shot – Gwaii Small Scale, Matabeleland South, Zimbabwe
4) Grid Reference – S19*12.583 E027*49.331

My applicaon for filed for this one and only hunt of mine.

Please let me know if you need anything else.

Best Regards
Wasif

On Wed, Oct 2, 2019 at 7:47 AM MacDonald, Tim <tim_macdonald@fws.gov> wrote:

> Wasif:
>
> U.S. Fish and Wildlife Service Prt # 97874C
>
> On 06/22/2018 an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt #97874C**. At the me of the applic aon' s submission the hunt was to be held at a future date.
>
> Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.
>
> If **no**, do wish to withdraw your applicaon a t this me?
>
> **Please confirm the current status.**
>
> ****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*
>
> Thank you,
>
> **Tim Mac Donald**

Government Information Specialist
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

RCVD JUN 22 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
PHILLIPS	WALLACE	S.	IV

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
COLLEGE STATION	TX	77845	BRAZOS	USA

2.a. Mailing address (Include if different than physical address; include name of contact person if applicable)
WELL WORLDWIDE ENERGY LOGISTICS, ATTN: LYNETTE LILLEY, 17401 ALDINE WESTFIELD RD.

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
HOUSTON	TX	77073	HARRIS	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): 06/01/2018

Please continue to next page

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

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

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

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

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

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

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

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

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

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

   FEDEX 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

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 TAXIDERMY
BRAKWATER
WINDHOEK, NAMIBIAA

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:

0055417
Original

2 Valid until: 15/08/2018

3 Importer (name and address)
Wallace Phillips
(b) (6) [redacted]
College Station
TX 77845

3a. Country of import: U.S.A.

4 Exporter / Re-exporter (name,address and country)
J. N. Blaauw
P. O. BOX 11903
Windhoek
Namibia

Signature of the applicant

5. Special conditions
Not valid if not certified by the Namibina customs
Tusks no s: NA 17 0023 8 10 & NA 17 0024 7 66

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 ENVIROMENT AND TOURISM
Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H
5b. Security stamp No.: 1555857

	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. 2Item	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 ***	
B	7./8. *Loxodonta africana* African elephant	9. jaw 2x skin panels 2x ears 4x feet & skull	10. II W	11. 10Item	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 progated for commercial purposes
*** for pre-Convention specimens

13.THIS PERMIT IS ISSUED BY: J Shapi

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
15 FEB 2018
Windhoek
Tel: 284 2823 • Fax: 258861

Windhoek — Place
15/02/2018 — 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 / Re-export | Date | Signature | Official stamp and title

Original

Namprint 2308

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.:	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: H.S. Phillips IV

Residential Address:

Country: USA

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
	Buffalo	
CITES I	Crocodile	
	Dik-dik	
	Eland	1X
CITES II	Elephant	1X
	Giraffe	
	Grey Duiker	2X
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	1X
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	2
	Warthog	2X
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
	Please report back with photos after hunting	

on the following farms / hunting concessions: Etosha Concessions

Guided by (name of guides): J.J.N. Hesselfall

Cashier receipt No.: 34(92)

Issued on 14.06.17 11:00

Amount received: N$

MINISTRY OF ENVIRONMENT & TOURISM
ISSUING OFFICER (NAME & SIGNATURE)
UNDER THE AUTHORITY OF THE MINISTER
Authorizing officer
IN TERMS OF SECTION
OF 1975 AS AMENDED.

Official MET date stamp

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

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				
										Name	No	Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
25-06-2017	Elephant							45	♂	Eseb			[redacted] (9) (a)	

*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.

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#X (b) (6) [redacted]

Cell Phone#X

SS# (b) (6) [redacted]

Email X (b) (6) [redacted]

Check appropriate box:(2)
- [X] An Individual
- [ ] A Sole Proprietorship
- [ ] A Partnership
- [ ] A Corporation
- [ ] A Limited Liability Company

KNOW ALL MEN BY THESE PRESENTS: That (3)X Wallace Simeon Phillips IV (Grantor)
[Full legal name of individual, partnership, LLC, or corporation, with business "dba" as appropriate]

doing business as

under the laws of the State of (4)

home address (5) X (b) (6) [redacted] College Station, TX 77845
[residing or having a principal]

hereby constitutes and appoints WELL Worldwide Energy Logistics, Inc to act through its officers, employees and 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 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 all the customs business, including making, sig
customs business, including making, sig
section 514 of the Tariff Act of 1930, in
concerned or interested and which
performed by an agent and attorney o
power and authority to do anything what
done in the premises as fully as said
acting, hereby ratifying and confirming
shall lawfully do by virtue of these presents; the forgoing power of attorney to remain in full force and effect until

(6) [X] Revoked [ ] [redacted]
(date written to assist data)

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 to 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 6/04) 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) (b) (6) [redacted]

(capacity) (7)
[If Duly Authorized Representative, supporting documentation must be provided]

(print name) (8) X Wallace S. Phillips IV

(date) (9) X

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.

Rev. 01/2007

John Rulon CHB
15619 Morales Rd.
Houston, Texas 77032
281-220-3158

October 12, 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
Attn: Anna Barry
5275 Leesburg Pike
Falls Church, Virginia
22401-3803
RE: PRT- MA97891C-0 Wallace Simpson Phillips

Dear Anna;

We refer to the above referenced permit application for an elephant that was submitted on 6/22/18.

The permit application that was originally submitted did not contain answers to question 9 parts a, b and c. We have obtained the information and wish to submit it and have it incorporated into the original application under consideration.

9a. A population study was recently completed by the Ministry of Environment and Tourism in Namibia. Their findings were that the population of elephants in 1975 was 7,500 and in 2017 the population was 22,700 which represents an annual growth of 4.5%. Additionally, the report estimated that the country can only support 22,000 elephants. Overpopulation will result in destruction of habitat and more conflicts with humans. Therefore the population will support the hunting that is being done and will even require additional relocation efforts or hunting to maintain recommended population levels.

9b According to the outfitter, the government of Namibia gets 1% of the trophy fee of $35,000USD. 65% of the trophy fee goes directly to the Eiseb community and is used however they wish. The remaining 34% goes to the outfitter and is used for all the costs of running the safari. 18 People are employed by the outfitter.

9c. In addition to the funds mentioned above The outfitter provides an additional 10,000 per year to the Eiseb community. The outfitter also provides additional services to the community. For example, this year, the outfitter is busy installing two waterholes which will provide clean water for the villages.

Hopefully, with this additional information, you will be able to process and approve the permit application. Should you need additional information, please contact the undersigned.

Sincerely,

John Rulon CHB

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.:	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.S. Phillips IV

Residential Address:

Country: USA

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
	Buffalo	
CITES I	Crocodile	
	Dik-dik	
	Eland	1X
CITES II	Elephant	1X
	Giraffe	
	Grey Duiker	2X
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	1X
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	2
	Warthog	2X
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
	*Please report back within 48hrs after shooting	

on the following farms / hunting concessions: Etosha Concession

Guided by (name of guides): J.J.N Hiesserfall

Cashier receipt No.: 94(929)

Issued on 14.06.17 10:00

Amount received: N$

MINISTRY OF ENVIRONMENT & TOURISM
ISSUING OFFICER (NAME & SIGNATURE)
UNDER THE AUTHORITY OF THE MINISTER
FOR THE PURPOSES OF SECTION 78 (1) OF THE NATURE CONSERVATION ORDINANCE OF 1975 AS AMENDED.
Authorizing officer

Official MET date stamp

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

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				
										Name	No	Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
25-08-2017	Elephant							45	♂	Eseb			[redacted] (6) (d)	

*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.

Barry, Anna <anna_barry@fws.gov>

[EXTERNAL] Addl. info for PRT-MA97891C-0 -- Wallace Simpson Phillips

1 message

Cindi Rulon <Cindi.Rulon@procargousa.com> Fri, Nov 16, 2018 at 4:44 PM
To: Anna Barry <anna_barry@fws.gov>

Dear Anna,

I am sending additional information for the elephant application for Wallace Phillips.

Please advise when you receive this email.

Best Regards,

Cindi Rulon

Hunting Trophy Dept.

Pro Cargo USA

15619 Morales Rd

Houston TX 77032

DIRECT- 281-220-3176

Main Tel # 281-590-5500

Direct FAX 281-664-4440

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

SMINOLTA (A18111615420.pdf
1019K

Barry, Anna <anna_barry@fws.gov>

[EXTERNAL] RE: Addl. info for PRT-MA97891C-0 -- Wallace Simpson Phillips -- UPDATE on address

Cindi Rulon <Cindi.Rulon@procargousa.com> Sat, Feb 16, 2019 at 3:21 PM
To: "Barry, Anna" <anna_barry@fws.gov>
Cc: DUSTY (b) (6) >, Candace Phillips (b) (6)

Dear Anna,

Wallace S. Phillips would like to change the mailing address for elephant permit# PRT-MA97891C-0 to:

Pro Cargo

15619 Morales Rd.

Houston, Texas 77032

An: Cindi & John Rulon

281-220-3176

Please contact me if you have any quesons.

Best Regards,

Cindi Rulon

Hunng T rophy Dept.

Pro Cargo USA

15619 Morales Rd

Houston TX 77032

DIRECT- 281-220-3176

Direct FAX 281-664-4440

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

From: Cindi Rulon
Sent: Monday, November 19, 2018 8:24 AM
To: 'Barry, Anna' <anna_barry@fws.gov>
Subject: RE: Addl. info for PRT-MA97891C-0 -- Wallace Simpson Phillips

Thank you, Anna.

Best Regards,

Cindi Rulon

Hun ng Trophy Dept.

Pro Cargo USA

15619 Morales Rd

Houston TX 77032

DIRECT- 281-220-3176

Main Tel # 281-590-5500

Direct FAX 281-664-4440

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

From: Barry, Anna [mailto:anna_barry@fws.gov]
Sent: Monday, November 19, 2018 6:39 AM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>
Subject: Addl. info for PRT-MA97891C-0 -- Wallace Simpson Phillips

Received.

Anna Barry

Supervisory Policy Specialist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281

E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Fri, Nov 16, 2018 at 4:45 PM Cindi Rulon <Cindi.Rulon@procargousa.com> wrote:

> Dear Anna,
>
> I am sending additional information for the elephant application for Wallace Phillips.
>
> Please advise when you receive this email.
>
> Best Regards,
>
> *Cindi Rulon*
>
> Hunting Trophy Dept.
>
> **Pro Cargo USA**
>
> 15619 Morales Rd
>
> Houston TX 77032
>
> DIRECT- 281-220-3176
>
> Main Tel # 281-590-5500
>
> Direct FAX 281-664-4440
>
> All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

Barry, Anna <anna_barry@fws.gov>

Wallace Simpson Phillips PRT #97891C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Feb 19, 2019 at 1:19 PM
To: Cindi Rulon <Cindi.Rulon@procargousa.com>
Cc: DUSTY (b) (6) Candace Phillips (b) (6)

Received, thank you.

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Sat, Feb 16, 2019 at 3:21 PM Cindi Rulon <Cindi.Rulon@procargousa.com> wrote:

> Dear Anna,
>
> Wallace S. Phillips would like to change the mailing address for elephant permit# PRT-MA97891C-0 to:
>
> Pro Cargo
>
> 15619 Morales Rd.
>
> Houston, Texas 77032
>
> An: Cindi & John Rulon
>
> 281-220-3176

Please contact me if you have any ques ons.

Best Regards,

Cindi Rulon

Hun ng Trophy Dept.

Pro Cargo USA

15619 Morales Rd

Houston TX 77032

DIRECT- 281-220-3176

Direct FAX 281-664-4440

All Pro Cargo business is subject to our terms, conditions and limitations, which can be found on our website at http://www.procargo.com/terms

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 25, 2018

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

RCVD JUL 3 2018

Re: Application for Permits to Import Sport-Hunted Trophies

Dear Chief Cogliano:

Enclosed please find three import permit applications. The first is for a permit to import a sport-hunted elephant trophy from the Mahango Game Park concession in Namibia. The Mahango area is part of the Zambezi Region of Namibia, and holds the country's largest elephant population, which is increasing. (See enclosed AfESG Status Report.) This operator, Thormahlen & Cochran, has been in business almost two decades and has carefully stewarded this concession. We will be submitted a report from this operator by separate cover. Please consider this information, as well as information in the DMA's files and submitted by Conservation Force and Namibia's Ministry of Environment and Tourism, in making a positive enhancement finding for this applicant.

The second applicant, who has two separate application forms, is hunting lion, elephant, and leopard on Sango Ranch in the Save Valley Conservancy in Zimbabwe. Conservation Force and Zimbabwe's Parks and Wildlife Management Authority have submitted extensive documentation about the healthy elephant and lion population in SVC and the benefits generated by regulated hunting. Please refer to that information, including the October 2016 Non-Detriment Finding and January 2016 report, describing the SVC's strong wildlife management. Please also see the attached declaration from Wilfried Pabst. This declaration was not ultimately submitted in court, but it remains a sworn statement that reflects the healthy wildlife populations in SVC. Please consider all this information in making positive enhancement findings and non-detriment findings for this applicant.

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

Sincerely,

Regina Lennox

Encl:
- AfESG Status Report (2016), excerpts for Namibia and Zimbabwe
- Willy Pabst, Owner of Sango Ranch, Declaration

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

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) [redacted]

Name: BOBBY G. LYNCH

Date: 06/08/2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
LYNCH	BOBBY	GLEN	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
MOLINO	FL	32577	ESCAMBIA	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in *Title 50 Part 13 of the Code of Federal Regulations* and the other *applicable parts in subchapter B of Chapter I of Title 50*, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

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)?

   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.
   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:

   MAHANGO PARK
   NAMIBIA

   b. Date wildlife was hunted:

   04/11/2017

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

ANTON MYNHARDT 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]:

THE YELLOW SHARK HOLDINGS (PTY) LTD.
PO BOX 8413 - WINDHOEK
WINDMILL PARK UNIT 7, DANTE STREET
PROSPERITA, WINDHOEK, 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).

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: ANTON MYNHARDT ALBERTS
Business Name: THORMAEHLEN & COCHRAN SAFARIS
Address: PO BOX 90911
City: KLEIN WINDHOEK
State/Province: 9000 WINDHOEK
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: (b) (6) _____ Date: 06/08/2018

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

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

The Yellow Shark Holdings (Pty) Ltd.
P.O. Box 81413 – Windhoek
Windmill Park Unit 7, Dante Street
Prosperita, Windhoek
Republic of Namibia

Phone: +264 (0)61 304030
Fax: +264 (0)61 304029
Email: info@yellow-shark.com

SPEDITIONSAUFTRAG / FORWARDING & SHIPPING CONTRACT

CONSIGNEE & ADRESS OF DESTINATION	Consignor & Adress of ORIGIN
MR. BOBBY GLEN LYNCH (b) (6) [redacted] 32577 MOLINE,FLORIDA UNITED STATES	MR. ANTON MUNHARDT ALBERTS THORMAEHLEN & COCHRAN SAFARI'S P. O BOX 90911 KLEIN WINDHOEK 9000 WINDHOEK NAMIBIA
Tel.1 [redacted] Fax [redacted]	Tel 1 +264 81 14907 Fax [redacted]
Tel.2 [redacted] eMail bobbyglynch@yahoo.com	Tel.2 [redacted] eMa carel@africatrophyhunting.com

Contract Number 18108

Windhoek, 18 Jan 2018

POS	Description	Skull	Horns	Cape	Skin	Tail	Sh.-mount	Tusks (sets)	Other	Other Details
[redacted]	[redacted]					[redacted]		[redacted]		
2	Leopard (Panthera pardus)	1			1				1	JAW

TOTAL No. of Items: 5

#2163977

Dear Rivelda

Please apply

AJ Dewaal

URGENT

18/01/18

URGENT

* OK WH

26/01/18

The Yellow Shark Holdings (Pty) Ltd
P. O. Box 81413 Olympia
Windhoek - Republic of Namibia
Phone +264 (061) 304030
fax +264 (061) 304029
Email: info@yellow-shark.com

AH Alberts

(b) (6) [redacted]

(b) (6) [redacted]

(b) (6) [redacted]

EP		VET		INVOICE	
CP		F178		DOCS	

SPECIAL IN

Casper Order:

last modified by SABINE

U.S. CITIZENS: – USF
Should your delivery address differ from the above
mail details where possible, as both we and the
We are acting as agents only and do not accept l

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
4/04/18	Elephant							58	Male	Mabango farm			(b) (6)	

2018-04-07
STATION COMMANDER CLERK
R. PRETORIUS

*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
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.:	169696
VALID FROM:	01.04.2017
VALID TO:	20.04.2017

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: Bobby G. Lynch

Residential Address:

Country U.S.A

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

CITES Indicates species listed on CITES Appendix I or II

NAM WILD

2018 -00- 07

STATION COMMANDER CLERK

	SPECIES: COMMON NAME	Number
	Buffalo	—
CITES I	Crocodile	1X
	Dik-dik	
	Eland	
CITES II	Elephant	1X
	Giraffe	1X
	Grey Duiker	1X
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	2X
	Klipspringer	
	Kudu	2X
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	—
	Warthog	2X
	Waterbuck	—
	Wildebeest, blue	1X
	Zebra, Burchell's	2X
CITES II	Zebra, Hartman's mountain	—
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other Please report back within 48 hours after shooting	

B. Peter

on the following farms / hunting concessions: Mahango Park

Guided by (name of guides): Nelson Nel, A.M. Alberts.

Cashier receipt No.: MET74091

Issued on 31.03.2017

Amount received: N$ 100-00

Authorizing officer

Official MET date stamp
MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
2017 -03- 31

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

prime press 072015

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

PERMIT / CERTIFICATE No.

0054310

[X] EXPORT
[ ] RE-EXPORT
[ ] IMPORT
[ ] OTHER:

Original

2. Valid until: 18/04/2018

3. Importer (name and address)
Bobby Glen Lynch
(b) (6)
32577 Moline
Florida

2018 -06- 07
STATION COMMANDER CLERK

4. Exporter / Re-exporter (name,address and country)
Anton Munhardt Alberts
P.O Box 00011
Klein Windhoek

Signature of the applicant

3a Country of import: USA

5 Special conditions
Not valid if not certified by a game warden prior customs
NA 17 0019 34 75 & NA 17 0020 32 15

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 ENVIROMENT AND TOURISM
Directorate Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H
5b. Security stamp No.: 1554875

	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 & tail	10. II W	11. 3 Item	11a. 54/90 (2017)
B	7./8.	9.	10.	11.	11a. /
C	7./8.	9.	10.	11.	11a.
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 ***
A							
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 progated for commercial purposes
*** for pre-Convention specimens

13.THIS PERMIT IS ISSUED BY: J. Shapi

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
CITES 2017
1554875
Windhoek
Private Bag 13306
Tel:

Windhoek — Place
20/10/2017 — Date
Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Landing / Air Waybill Number:

Block	Quantity
A	
B	
C	
D	

Port of Export / Re-export | Date | Signature | Official stamp and title

Original

Nampint: 2303

African Elephant Status Report 2016

An update from the African Elephant Database

C.R. Thouless, H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P Bouché

Occasional Paper of the IUCN Species Survival Commission No. 60

SSC Species Survival Commission

AFRICAN ELEPHANT SPECIALIST GROUP

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Namibia is 22,754 ± 4,305 at the time of the last survey for each area. There may be an additional 90 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 84,283 km^2, which is 52% of the estimated known and possible elephant range. There remains an additional 48% of the estimated range for which no elephant population estimates are available.

The elephant population of Namibia has continued to increase although, with wide confidence limits in aerial surveys and elephants moving across international borders, it is not possible to be precise about how great the increase in the national population has been.

There are four main populations, the transfrontier population (with Zambia, Angola, Botswana and Zimbabwe) in the Zambezi Region, in Khaudum National Park in the north-east, the Etosha National Park population, and the Kunene population in the north-west which includes the "desert" elephants.

There has been an increasing trend in elephant numbers in the Zambezi Region since surveys started in the 1980s. This is likely to have been a result of both natural growth and movement from neighbouring countries. **Aerial sample counts** were carried out in 2007, 2011, 2013, 2014, and 2015, giving estimates of 8,380, 10,847 ± 3,580, 9,165 ± 2,016, 14,097 ± 2,678 and 13,116 ± 3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725 ± 2,206 (Kolberg, 2004). There was also a total count carried out in 2007 (Chase, 2007) and a sample count in 2008 (Kolberg, 2008). However the latter was carried out with an inexperienced crew and the results were thought to be a considerable underestimate (Kolberg, 2008).

The elephant population of Khaudum NP and the neighbouring community conservancies of Nyae Nyae and N≠a Jaqna have been established since the 1980s, with the provision of artificial water and movements across the border from Botswana. Three **aerial sample counts** were carried out in 2011, 2013 and 2015 giving estimates of 4,731 ± 1,940, 3,638 ± 1,164, and 6,413 ± 2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758 ± 2,289 for Khaudum, 61 ± 115 for N#a Jaqna (Kolberg, 2004) and 967 ± 481 for Nyae Nyae (Stander, 2004). None of these are significant differences.

There is a limited movement of elephants between Angola and the Kavango region to the north-west of Khaudum (Terblanche, 2016).

There is a small elephant population in the Mangetti area between Khaudum and Etosha. The AESR 2007 indicated that they occupy the Mangetti Game Reserve, whereas their range is actually concentrated around the Mangetti Cattle Ranch to the west, and also probably extends into the Ukwuangali communal area to the north. Ninety individuals were observed in Mangetti in 2015 (Lindeque, pers. comm., 2016). This **informed guess** replaces one of 20 from 2005 (Ministry of Environment and Tourism, 2005).

SUMMARY TOTALS

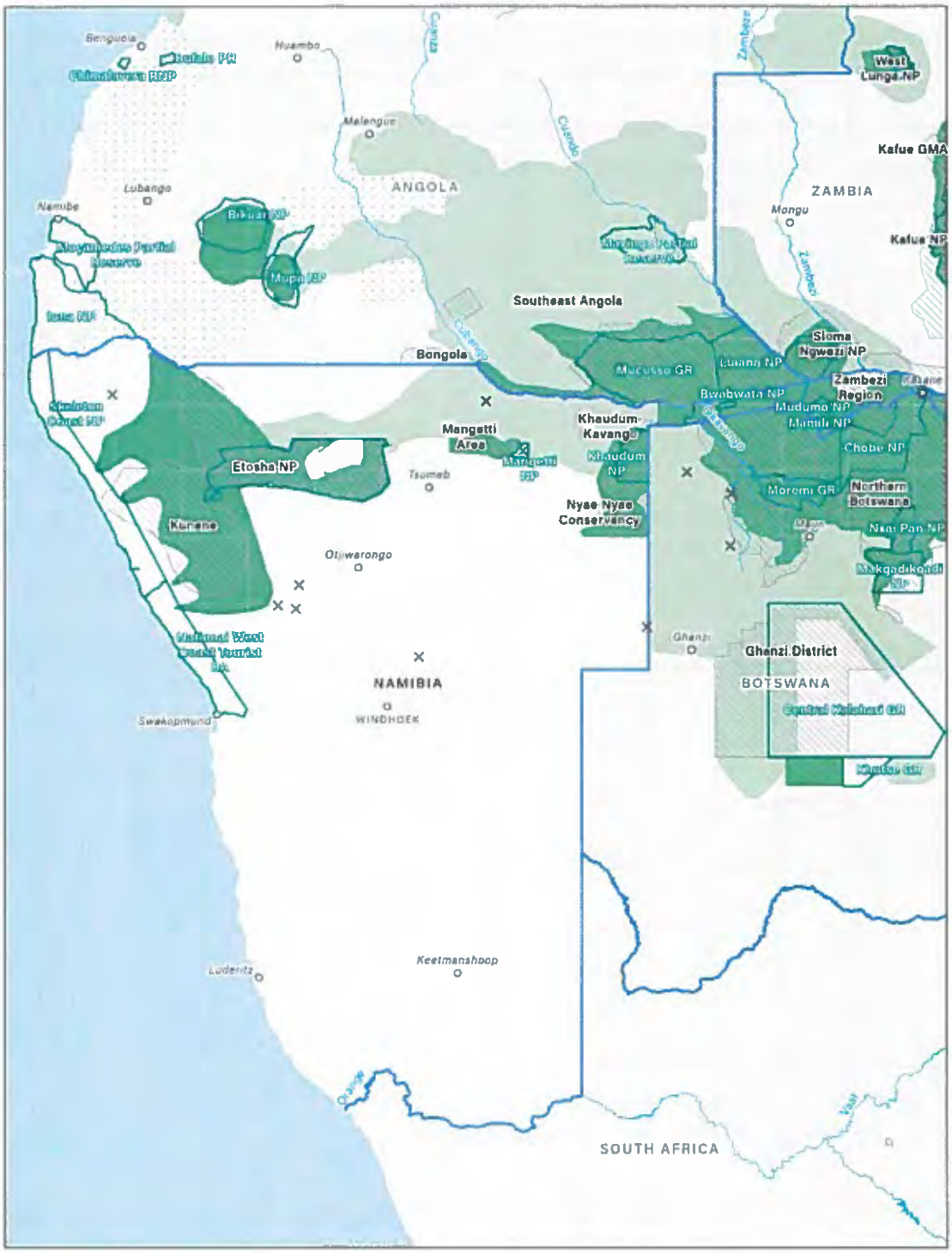
SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
Totals 2015	**22,754**	**4,305**	**90**	**90**		
Totals 2006	**15,807**	**3,276**	**20**	**20**		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
Total Range					100 %	164,069

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
Totals	+6,947	±5,410	+70	+70	52 %	84,283

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Direct Sample and Reliable Dung	65,438	2,683	68,121
Informed Guesses	15,903	259	16,162
Unassessed Range	31,130	48,655	79,786
Totals	112,471	51,598	164,069



0 90 180 270 360 450 540km

Int'l Boundaries
Rivers & Lakes
Towns
Protected Areas
Input Zones

ELEPHANT RANGE
Known
Possible
Doubtful
Sighting

ABBREVIATIONS AND ACRONYMS

See Appendix III for map abbreviations and acronyms

AfESG

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FRIENDS OF ANIMALS, *et al.*,	
Plaintiffs,	
v.	No. 17-cv-002530-RCL
Ryan ZINKE, *et al.*,	Judge Royce Lamberth
Defendants, and	
SAFARI CLUB INTERNATIONAL *et al.*,	
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^2 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 re-colonize 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

Wilfried Pabst

Ministry of Environment and Tourism
Republic of Namibia

SPECIES MANAGEMENT PLAN

Elephants

Loxodonta africana

December 2007

SPECIES MANAGEMENT PLAN

Elephants

Loxodonta africana

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GLOSSARY AND DEFINITION OF TERMS

Acronyms

CITES	- Convention on International Trade in Endangered Species of Wild Fauna and Flora
DPWM	- Directorate of Parks and Wildlife Management
DSS	- Directorate of Scientific Services
DWNP	- Department of Wildlife and National Parks, Botswana
GEF	- Global Environment Fund
KAZA	- Kavango-Zambezi
MET	- Ministry of Environment and Tourism
NNF	- Namibia Nature Foundation
PAC	- Problem Animal Control
TFCA	- Trans-Frontier Conservation Area
UNDP	- United Nations Development Programme
WWF LIFE	- World Wide Fund for Nature: Living in a Finite Environment programme

Definition of Terms

"Background Study": This refers to the *Background Study for Elephants* prepared under the Ministry of Environment and Tourism's **Transboundary Mammal Project** (Martin 2005).

"Caprivi" and "Caprivi Strip": The word 'Caprivi' is used throughout the Plan to refer to the 'peninsula' of land extending eastwards from the north-eastern corner of Namibia as far as its junction point with Botswana, Zambia and Zimbabwe at the confluence of the Chobe and Zambezi Rivers. The phrase 'Caprivi Strip' is reserved for the narrow 'isthmus' connecting the broader part of the peninsula to the main body of Namibia.

"Population and Subpopulation": In this report, the term subpopulation is loosely used to refer any geographically distinct subdivision of the overall population within a country.

"Kasane Workshop": A workshop was held in Kasane, Botswana on 30th November and 1st December 2002 in which representatives of the Namibian Ministry of Environment and Tourism and the Botswana Department of Wildlife and National Parks participated with the aim of collaboration on joint management issues affecting the buffalo population shared between the two countries. The *Background Study for Southern Savanna Buffalo* (Martin 2002) was presented at the workshop.

"Windhoek Workshop": A workshop was held in Windhoek on 23rd September 2003 in which representatives of the Namibian Ministry of Environment and Tourism and the Botswana Department of Wildlife and National Parks participated with the aim of collaboration on joint management issues affecting roan, sable and tsessebe. The *Background Study* and *Management Plan for Roan, Sable and Tsessebe* (Martin 2003) were presented at the workshop.

ACKNOWLEDGEMENTS

This plan is based on a draft elephant management plan researched, coordinated and prepared for the Ministry of Environment and Tourism (MET) by Rowan Martin in 2005, as part of The Transboundary Mammal Project of the MET, Namibia, facilitated by the Namibia Nature Foundation and the World Wildlife Fund's LIFE Programme.

EXECUTIVE SUMMARY

The status of elephants in the southern African region

The African elephant has achieved huge prominence in global conservation issues in the past 20 years. Few other species are capable of arousing emotions, polarizing viewpoints and causing controversy to the extent that *Loxodonta africana* has done. Within Africa opinions are divided on the subject of elephant management and the situation is no less contentious than in the international arena.

Elephants are classified as *Endangered* in the IUCN Red Data Book. In 1989, rightly or wrongly, the species was listed on Appendix I of CITES and legal trade in ivory was effectively banned. Although the Namibian elephant population was transferred to Appendix II in 1997, conditions attached to the listing have made it almost impossible for ivory to be traded.

In 2002, the population in the whole of Africa was estimated at about a half million elephants. The southern African region holds more than half of this population and, projecting at normal population growth rates, it is likely to be around 350,000 - 400,000 animals in 2007. Clearly, elephants are not threatened in southern Africa and this raises the question whether they can be validly classified as endangered at the continental level.

The largest concentrations of elephant in southern Africa are in a central zone extending across the continent between latitudes 15º - 20º south of the equator (**Map 1**). Within this zone, Botswana and north-western Zimbabwe hold some 250,000 elephants. The rapid expansion of these populations into neighbouring countries is affecting biodiversity and human livelihoods.

The 'elephant problem' is central in initiatives to create transfrontier conservation areas (TFCAs) in the region. The need for elephants to have access to far larger areas than those in which they are currently confined is recognized and, for many, TFCAs are seen as the solution to the increase in elephant populations. Unfortunately, a problematic legacy of national boundaries, coupled with a lack of coherent land-use planning in all of the participating countries including the Kavango-Zambezi (KAZA) TFCA (Angola, Botswana, Namibia, Zambia and Zimbabwe) means that this TFCA will undergo a long and difficult birth. Any respite arising from the increased range is likely to be short lived: at current rates of population increase, elephants will remain overabundant.

It would be highly desirable if a common management approach for elephants could be developed amongst the countries sharing the elephant range. However, the corollary to this is that, in the absence of any agreement with neighbouring countries, it cannot reasonably be expected that Namibia will not undertake management interventions in the best interests of its local peoples and conservation concerns.

The status of elephants in Namibia

Elephants occur across the entire north of Namibia (**Map 2**) with two main sub-populations in the north-east and the north-west. In 2004 the total population was estimated at over 16,000 animals and, allowing for underestimates on aerial surveys, the true number in 2007 is likely to be closer to 20,000.

The north-western population is about 4,000 animals and includes the elephants in Etosha. This appears to be growing at about 3.3% per annum and expanding its range. Elephants are being seen as far south as the Ugab River and in all of the river catchments which flow westwards to the Atlantic Ocean in the north. As yet, the extreme north-western part of the potential range along the Kunene River has not been re-colonized although elephants were present in this area until 1990.

The north-eastern population will probably reach 16,000 animals this year. The recent increases are well in excess of normal growth rates (which are less than 5% per annum) and must be attributed to the migration of the northern Botswana population (which consists of about 160,000 elephants) and the north-western Zimbabwe population of about 90,000 elephants.

The conservation status of elephants in Namibia is more than satisfactory – their numbers already exceed what many would consider desirable for the available habitats and they have been identified as a possible threat to other rare and valuable species which Namibia is trying to conserve. There are no limiting factors preventing an increase in their numbers.

Elephants are classified as *Specially Protected Game* under Namibian law. The original justification for such a listing may well have disappeared. To achieve the objectives of this Management Plan, several revisions to the legal provisions for elephants under Namibian legislation would be desirable.

Under Namibian environmental legislation, management plans are required for species that are rare or valuable and that share boundaries with neighbouring countries. Elephants are not rare but they are potentially valuable and, within multi-species wildlife systems, could provide a financial and economic return that greatly exceeds that possible from alternative land uses. A management plan that treats elephants as a valuable resource could transform the primary land use in northern Namibia.

The issues

In both the north-west and the north-east, conflicts with humans are escalating due to the increase in elephant and human population numbers. The benefits that communities receive from elephants on their land do not come close to compensating them for their losses. Farmers are not free to defend their livelihoods from elephant depredations and the current arrangements for control of problem elephants are too tardy to be effective. A potential threat to elephants is the inception of a wave of illegal hunting or retaliatory shooting by dissatisfied people.

In north-western Namibia, elephant populations have considerable latitude for increasing their range and the situation may not require management interventions for many years. However, in the north-east, the escalating levels of conflict between humans and elephants and the damage to vegetation suggest that the time for action has already been reached.

Initially, the problem in the north-east may appear intractable: the Caprivi, Khaudum and Nyae Nyae areas lie on the periphery of the largest elephant population in Africa. Management interventions carried out in isolation in Namibia will not affect the core elephant populations from where the problems emanate. The huge number of elephants south of the Caprivi presents Namibia with a management challenge: however, notwithstanding any decision by Botswana

and Zimbabwe not to manage their elephants, Namibia should take full advantage of the opportunity presented. The justification is that elephants are causing significant hardships for people and threatening conservation objectives in the north-east.

Namibia's short-term problem is to accommodate the current increase in elephants. However, it is not the long-term solution. Elephants do not regulate their own numbers at levels which maintain savanna woodland habitats – a process which culminates in population crashes. In the long term population reductions may be necessary. In the north-west, the management requirement may simply be to increase the range available to elephants: in north-eastern Namibia not only does the range need to be increased but, in some areas, the population may need to be reduced (**Fig.1** at the end of this Summary).

Technically, there are no good reasons why more land in Namibia should not be available to elephants. The highest valued land uses over most of this arid country (**Map 3**) are those based on management of natural resources. Moreover, the full potential is far from being realized at present due to national and international policy constraints that place wildlife at a competitive disadvantage with land use based on exotic species. Were subsidies to be removed from the domestic livestock industry and were it possible for elephant to play their full economic role in land use systems, it could reasonably be expected that large additional areas of land would be converted to wildlife management in areas where relatively low human densities would enable the co-existence of people and elephants, as elsewhere in the country – for example, parts of the northern Kavango, central northern regions and in the Eastern Caprivi. This would remove the short-term limiting factor of providing additional ranges for elephant.

The technical arguments for greater areas of Namibia to be put over to natural resource management will not, on their own, bring about the needed changes to remove this limiting factor for elephants. It will require a high level of political commitment and the correct suite of incentives to induce landholders (both communal and private) to convert to a land use based primarily on wildlife. The high level of political commitment is already in place. In a speech delivered on 3rd February 2004, His Excellency the Founding President, Dr Sam Nujoma, made the visionary statement that wildlife would be restored throughout the north of Namibia, that ownership of wildlife would be conferred on local peoples and that the economy would be transformed by diversification based on wildlife uses.

For elephants, two factors mitigate against realizing the Founding President's vision. The first is that the full value of elephant commodities (ivory, elephant skin and meat) cannot be realized due to international trading constraints. The second is that elephants in Namibia are effectively State property – which was clearly not the President's intent. These two major disincentives need to be addressed before the conditions for increasing elephant range will be achieved.

Full devolution of rights over elephants to landholders (on both communal and private land) is a prerequisite for creating the incentives to allow elephant populations to expand. It is a necessary but not a sufficient condition. Large areas co-managed between the State and relevant landholders will be necessary to provide viable ranges, to distribute the pressure of elephants on habitats and to allow population increase and expansion.

The Vision Statement developed under the current UNDP/GEF assisted project in Namibia provides for co-operation between stakeholders to achieve this far-sighted concept. Linkages

would be established under a co-management system which would both secure and increase the available range for elephant (**Map 4**).

In the north-east, elephant population reduction may be necessary. However, there are no simple answers to the question of how many elephants need to be removed – either to conserve biological diversity or to reduce conflicts between humans and elephants. The starting premise may be that the option of zero use is not a reality – elephants will be harvested illegally and unsustainably if facile attempts are made to debar their use. These all point towards a need for imaginative and innovative management. The aim should be to avoid routine cropping or culling programmes which attempt to impose constancy on naturally fluctuating ecosystems. The challenge is to make it sustainable, requiring an adaptive management approach.

Combining adaptive management with the arguments for co-management results in a classic situation where the principles of adaptive co-management in complex bio-economic systems need to be applied. The individuals who are most affected by elephants are those living in the north-east: together with the State authorities, they should decide how elephants should be managed.

MANAGEMENT PLAN

A feature of this management plan is just how few actions are needed to bring it to fruition. Success relies on a few administrative masterstrokes which will cost next to nothing – rather than a long list of expensive management activities. It would be as well for MET not to enter any co-management forums with preconceived moral positions on elephant. Having accepted that the solutions to the current 'elephant problem' may lie in innovative management inspired by the values of local people, a *tabula rasa* (or clean slate) is needed to accept with an open mind all options presented.

Vision, Goal, Objectives, Strategy and Actions

The Vision Statement begins with a preambular statement which expresses Namibia's desire to work with neighbouring countries and the international community to enhance the status of elephants, clarifies Namibia's position on elephants and draws attention to the fact that a policy of total protection for elephant will result in their available range being reduced to State protected areas and a decrease in their numbers. In contrast, a policy of sustainable use, as enshrined in the Namibian Constitution, will result in the expansion of the range available to elephants and an increase in their numbers. The goal and objectives then follow.

The **Strategy** consists of five actions which are listed below and shown in **Fig.2** (at the end of this Summary).

(1) **Devolution of authority for landholders, both communal and private, to manage elephants on their land**. This is a prerequisite for co-management institutions to be formed.

GOAL

Namibia wishes to carry the maximum number of elephants that is consistent with the conservation of biological diversity AND the wishes of those primary stakeholders who have elephants on their land

SOCIAL OBJECTIVE

1. **To reduce conflict between elephants and people**
2. **To create conditions under which elephants are a benefit to people**

ECOLOGICAL OBJECTIVE

1. **To increase the range available to elephant**
2. **To conserve biological diversity in State protected areas and promote the conservation of habitats outside State protected areas in the elephant range**

ECONOMIC OBJECTIVE

To enable the full economic potential of elephants to be realized according to the provisions for sustainable use in Namibia's Constitution

(2) **Representations on the location of veterinary control fences**. This is a matter for the Ministry to pursue from the outset of the management plan. The influence of veterinary fences on the current elephant range both in Namibia and in the region is profound. In the vicinity of the Mahango Core Area within Bwabwata National Park, there is a bottleneck caused by the veterinary fences on the southern boundary of the Caprivi and along the international border between Botswana and Namibia, which affects the entire regional range for elephant across the central southern African region (**Map 5**).

(3) **The removal of the CITES constraints affecting Namibia's ability to trade in ivory.** These constraints exert a negative effect on conservation of elephant in Namibia and act as a disincentive to the adoption of wildlife management as a primary form of land use. However, the management plan is worth pursuing even if the full value of elephant products cannot be achieved immediately – there are substantial values to be derived from elephants through tourism and international trophy hunting even if they fall short of the ideal.

(4) **Establish co-management institutions between the State and primary stakeholders.** Namibia's record of an expanding wildlife industry over the past 10 to 20

years is impressive. The present mosaic of parks, conservancies and commercial farms provides a sound foundation for the 'scaling up' of institutions needed for the management of elephant.

The new high-level institutional structure proposed for the State wildlife agency under the MET/UNDP/GEF project is ideally suited to this from a geographical perspective. The new divisions, subdivisions and sections are well matched to the elephant ranges that will require co-management institutions.

(5) **Apply adaptive management principles to the decisions of co-management institutions.** The agenda for co-management institutions would include the setting and allocation of trophy hunting quotas, problem animal control and population reductions.

The realization of the objectives in the Vision Statement should follow sequentially (**Fig.2**). Reduction of elephant populations in the north-east should help to conserve biological diversity; local communities should receive increased benefits from elephants and, hence, conflict will be reduced. With full devolution of rights over elephant, the incentives will be present for the elephant range to increase. The full economic objective will only be achieved when the permanent elephant range has expanded across northern Namibia (**Map 4**) and the last CITES constraints have been removed.

Risks

Given the escalating human-elephant conflict and the extreme modification of habitats in north-eastern Namibia, **the greatest risk to Government's position is to do nothing**. Failure to implement the necessary devolutionary measures and enter into co-management carries the real risk that local people will take matters into their own hands or, worse still, collaborate with illegal hunters from neighbouring countries. Inactivity will not simply result in the *status quo* being maintained. Since the 1970s, elephant populations have collapsed in an apparently inexorable process across Africa and it has occurred where the State has claimed ownership of elephants.

There is little risk that any management interventions could have an adverse effect on the status of elephant populations in Namibia. Populations are expanding and being augmented by migration from Botswana and Zimbabwe. Provided the effects are properly monitored, experiments in management will provide a learning experience.

Finance and Capacity

This management plan differs from other species management plans in that very little funding is required to implement it. The main costs lie in co-ordination and implementation of management activities that arise from co-management decisions. The potential income from elephant management is substantial and should more than cover these costs. Even if the full value of ivory and elephant skin is not achieved, the revenue from tourism and sport hunting will provide some 75% of the amounts required.

If elephant sport hunting were combined with reduction of elephant populations in the north-east, the expected revenue would be some **N$13 million** in the State protected areas (a total of 14,000km^2 including the Caprivi Forest Reserve) which would meet the present budget allocations for the north-east and would meet at least two-thirds of the budgets proposed under the MET/UNDP/GEF project. In the communal lands, the net

income/hectare (**N$8.7**) should more than offset the costs which elephant are presently causing through crop raiding and other damage. These figures do not include the net income of safari operators which would be about N$9.7/ha.

Transboundary Co-operation

Most of the management activities identified for potential co-operation and collaboration between Botswana and Namibia at the Kasane Workshop (2002) and Windhoek Workshop (2003) repeat themselves in this Management Plan.

The desirability of collaboration on elephant management among the countries participating in the KAZA TFCA was stated on the first page of this executive summary. A common approach to hunting quotas, problem animal control and population reductions would have the beneficial effect of not causing elephants to move from one country to another to escape different management regimes. This plan is structured so that the management of elephants on Namibian soil is not dependent on decisions by neighbouring countries: it is, first and foremost, a national plan. However, because it is based on adaptive management, decisions taken in co-management forums could be flexibly adjusted to accommodate collaborative management.

There are strong grounds for forming an alliance among Angola, Botswana, Namibia, Zambia and Zimbabwe specifically aimed at more effective performance in the CITES forum – based on the fundamental premise that all wildlife products should have value and legal trade is beneficial for conservation.

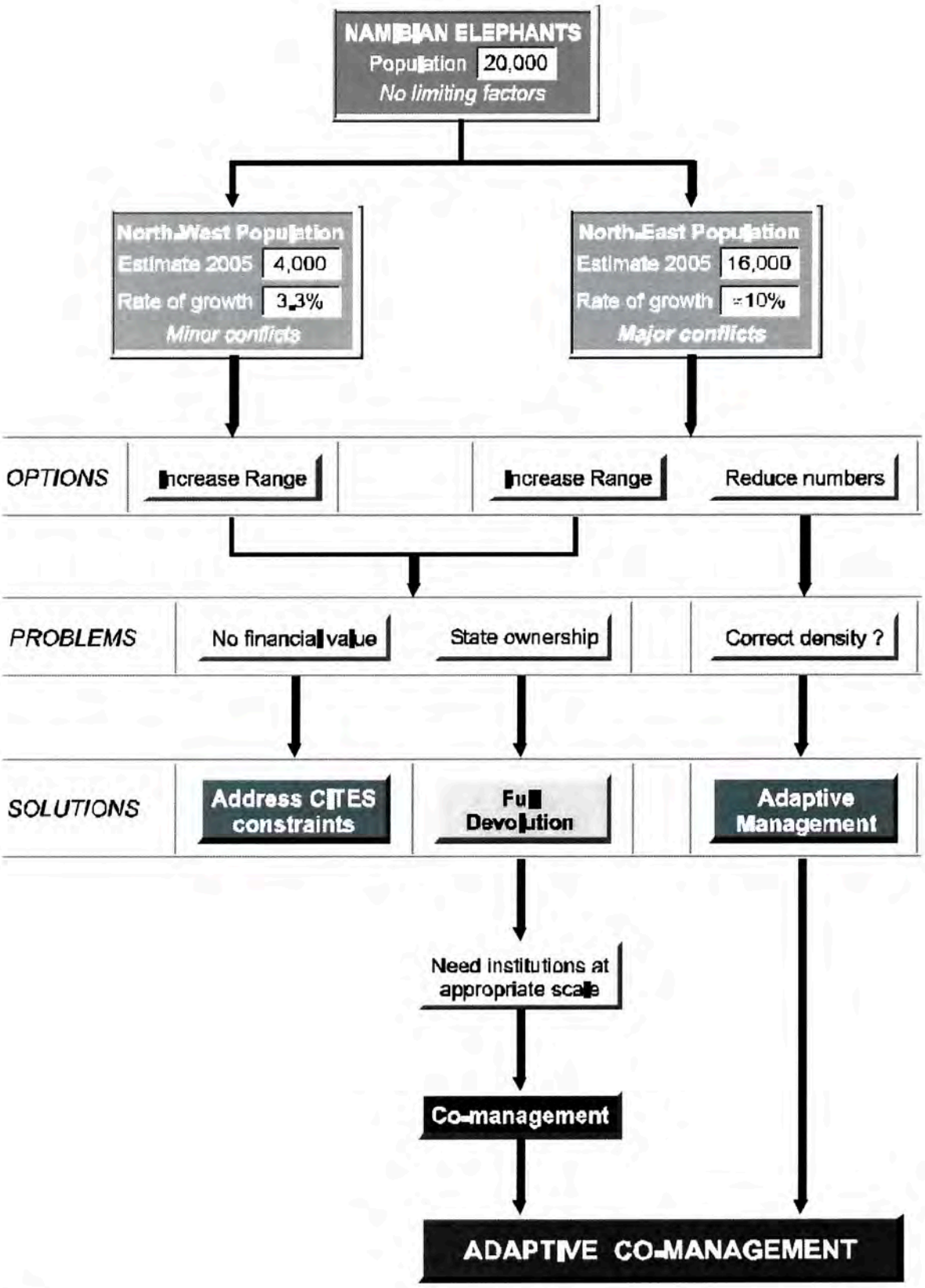

Fig. 1: Management of the Namibian Elephant Population – Options, Problems and Solutions

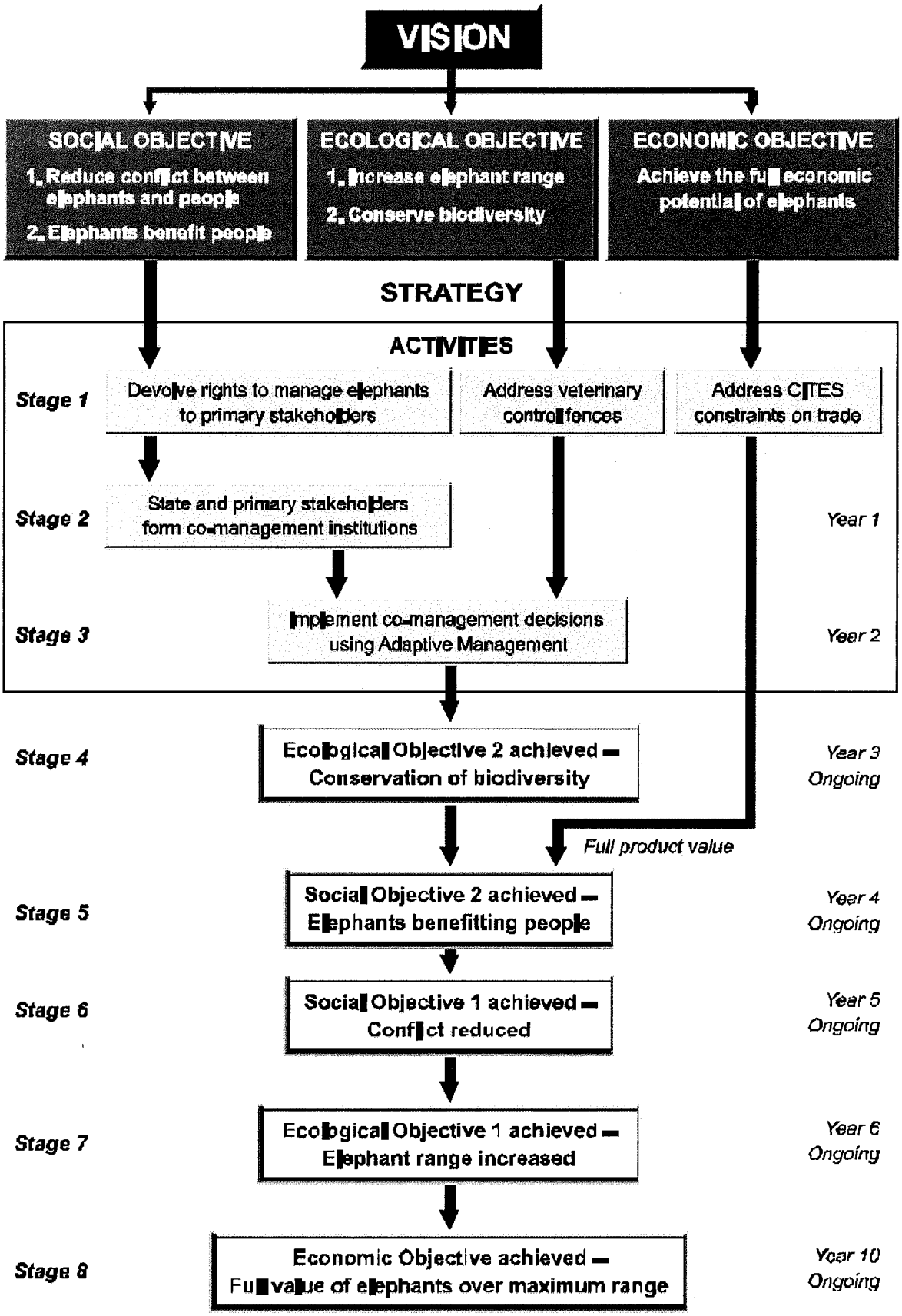

Fig. 2: Strategy for Management of the Namibian Elephant Population

INTRODUCTION & BACKGROUND

This Species Management Plan should be read in conjunction with the Background Study for Elephants prepared under the Transboundary Mammal Project of the Ministry of Environment and Tourism (MET) in April 2005.

Conservation Status and Significance

The taxonomy of Macdonald (2001) places the Savanna Elephant *Loxodonta africana* in the Family ELEPHANTIDAE, the only family in the Order PROBOSCIDEA (mammals with trunks) which is one of three Orders in the Superorder SUBUNGULATA (elephants, dugongs and hyraxes) which is part of the Infraclass EUTHERIA (placental mammals) in the Subclass THERIA (mammals bearing live young) in the Class MAMMALIA (mammals).

In the IUCN Red Data Book (Hilton-Taylor 2000), the species is classified as *Endangered*. This classification is based less on the actual numbers of elephant and more on the fact that the population is fragmented and has suffered recent catastrophic declines in some countries.

The African elephant was listed on Appendix I of CITES[1] at the 7th Meeting of the Conference of the Parties held in Lausanne in 1989. At the 10th CITES meeting in Harare in 1997 the elephant populations of Botswana, Namibia and Zimbabwe were transferred to Appendix II which, in theory, enables these countries to trade in ivory and elephant products. In practice, numerous obstacles have been placed in the way of trade – "*the Conference of the Parties has . . . adopted increasingly complex requirements for trade in elephant products that have all but ensured that such trade does not take place*" (MET 2004).

The distribution of elephants in southern Africa is shown in **Map 1**. It is emphasized that the elephant range shown on the map is no more than a 'snapshot' in time. The rapid expansions that are taking place in elephant populations in southern Africa, particularly in and around the Caprivi, will make any map outdated within a year. In 2002, the population in the whole of Africa was estimated at 560,904 elephants (African Elephant Database, AfrESG 2002).[2] More than half of this population is in southern Africa[3] and more than half of this is in Botswana (DG 2004). Projecting at normal population growth rates, the elephant population in southern Africa is likely to be around 350,000 to 400,000 animals in 2007. It is clear that elephants are not threatened in southern Africa and this raises the question whether they can be validly classified as threatened at the continental level.

The conservation status of elephants in Namibia is more than satisfactory – their numbers already exceed what many would consider desirable for the available habitats. Indeed, Namibia might want to avoid habitat changes of the sort that have happened in large parts of the elephant range in northern Botswana as a result of an overabundance of elephants (DG 2004, p7). In all other species management plans prepared thus far concerning ungulate species of the north-east, elephants have been identified as a possible threat to other species.

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[1] Convention on International Trade in Endangered Species of Wild Fauna and Flora

[2] "Definite" – 402,067; "Probable" – 59,024; "Possible" – 99,813

[3] "Definite" – 246,592; "Probable" – 23,722; "Possible" – 26,098; Total – 296,412

The economic contribution which elephant could make to the wildlife industry and to land use values in northern Namibia is very high, especially if the present elephant range can be consolidated and expanded southwards in the central area between the north-western and north-eastern populations. For non-hunting tourism, this contribution would come more from expanding the elephant range than from increasing numbers in the present range.

Under a high quality trophy hunting regime, elephants could bring in a net income of about US$120,000 for every 1,000 animals in the population. In the north-east of the country where elephant densities are reaching a level of 1/km^2, the net financial return should be of the order of US$1.20/ha (N$7.50/ha). When added to the present net returns from existing wildlife management without elephant hunting, this could result in a doubling of income. The present levels of exploitation of elephant for sport hunting on communal land in the Caprivi, eastern Kavango and Otjozondjupa regions (NNF 2004) are well below sustainable off-take levels and could be significantly increased for the benefit of local people.

In economic terms, the 'net value added' to land use values by the inclusion of sport hunting on commercial farms in the north of Namibia is, in all cases, more than double the value of the cash income (Barnes & de Jager 1995) and this relationship should hold true for the enhanced income obtained by adding elephants to the species mix.

Were the Ministry to combine elephant sport hunting with the reduction of elephant populations through culling in the State protected areas in the north-east of the country (a total of 14,000km^2 including the Caprivi Forest Reserve), the expected income would be some N$13 million which would meet the present costs of maintaining and managing these areas. If a similar management regime were practised by the conservancies in the north-east, the increase in income would also be substantial and should more than offset the costs which elephant are presently causing through crop raiding and other damage.

Elephants are classified as *Specially Protected Game* under Namibian law (Schedule 3, Nature Conservation Ordinance, Order No.4 of 1975). The original justification for such a listing may well have disappeared. However, designating the species as *Protected Game* (Schedule 4) or as *Huntable Game* (Schedule 5) or as a *Problem Animal* (in terms of Section 53(1)) would not introduce any greater flexibility in the management of the species as long as the provisions of section 37 (hunting of game to protect grazing, cultivated lands and gardens) expressly exclude elephants from being hunted either by private landholders (subsection 37(1)(a)(i)) or communal lands residents (subsection 37(1)(a)(ii)) in defence of their own livelihoods. To achieve the objectives of this Management Plan, several revisions to the legal provisions for elephants under Namibian legislation would be desirable.

Populations

Elephants occur across the entire north of Namibia (**Map 2**) with two main subpopulations in the north-east and the north-west. The subpopulations are not genetically isolated since they are weakly linked through the 'occasional' range in the central area which includes a small resident population of about 20 animals in the Mangetti.

The north-western range appears to be expanding at present. Elephants are being seen as far south as the Ugab River and in all of the river catchments which flow westwards to

the Atlantic Ocean in the north. As yet, the extreme north-western part of the potential range along the Kunene River has not been re-colonised although elephants were present in this area up until 1990.

Estimates of numbers are shown in the table below. In 2004 the total population was estimated at over 16,000 animals and, allowing for underestimates on aerial surveys, the true number in 2005 is likely to be closer to 20,000. The north-western population appears to be growing at about 3.3% per annum and there are movements of elephants in and out of Etosha National Park. The recent increases in the north-eastern population are well in excess of normal growth rates (which are less than 5% per annum) and must be attributed to migration from the northern Botswana population (about 150,000 elephants) and the north-western Zimbabwe population of about 50,000 elephants. The huge number of elephants south of the Caprivi presents Namibia with a management challenge.

Estimates of elephant numbers in Namibia

	NORTH-WEST		**NORTH-EAST**	
	Etosha National Park	Kunene and Erongo regions	Khaudum & Nyae Nyae	Caprivi East & West
Aerial surveys began in	1966	1968	1977	1978
Highest estimate	*2,800*	*800*	*4,815*	*8,726*
Year	*(1983)*	*(2004)*	*(2004)*	*(2004)*
2004 Estimates	2,057	800	4,815	8,726
Subpopulation Totals	**2,857**			**13,541**
2005 Projection	2,656	1,033	5,658	10,268
Rounded to nearest hundred	2,700	1,000	5,700	10,200
Subpopulation Totals	**3,700**			**15,900**
Total population projected for 2005		**20,000**		*rounded to nearest thousand*

Notes:

The numbers given for 2004 are aerial survey estimates except for the Kunene and Erongo regions which are based on estimates by Loutit and Leggitt.

The 2005 projections for the North-west are based on a population growth rate of 3.3% and a correction factor of 25% for undercounting.

The 2005 projections for the North-east are based on population models (see *Background Study*) which include a correction factor of 25% for undercounting.

In addition to the numbers shown, an additional 76 elephants are on private land in northern Namibia.

Limiting Factors and Threats

At present no factor is preventing an increase in numbers of elephants in Namibia. Elephant populations might increase faster with the addition of more water points[4], with the removal of veterinary fences[5] or with less competition from cattle[6] but, even with these constraints, the information presented in the *Background Study* suggests that elephant are increasing at the maximum possible rate.

In both the north-western and north-eastern subpopulations, conflicts with humans are escalating due to the increase in elephant and human population numbers. In the extreme north-west, these conflicts are relatively minor because human populations are sparse and few crops are grown, although this may not be true for the Cuvelai area north of Etosha. In the north-east, crop damage incidents are a major problem.[7]

The benefits which communities are receiving from elephants on their land are small. The number of elephants hunted as trophies and problem animals is low and does not come close to compensating communities or individuals for their losses. Farmers are not free to defend their livelihoods from elephant depredations and the current arrangements for control of problem elephants are too tardy to be effective. O'Connell (1995) found an extremely hostile attitude towards wildlife among the Caprivi peoples and the inception of conservancy projects did little to ameliorate this attitude. With all conservancies being in a fledgling stage, there is a 'wait-and-see' attitude among their members. The recent rapid increase in the numbers of elephant in the Caprivi may be due to a temporary tolerance of elephants while conservancies are in their formative stage. The situation is finely balanced and it would require little in the way of disincentives for the entire edifice to collapse. A potential threat to elephants is the inception of a wave of illegal hunting by dissatisfied people.

The factors which should influence decision-taking and the options, difficulties and possible solutions to elephant management in Namibia are shown in a simplified diagram (**Fig.1**). In the north-west of Namibia elephant populations have considerable latitude for increasing their range and the situation may not require management interventions for many years. However, in the north-east, the escalating levels of conflict between humans and elephants suggest that the time for action has already been reached. Initially, the problem in the north-east appears intractable: the Caprivi, Khaudum and Nyae Nyae areas lie on the periphery of the largest elephant population in Africa. Management interventions carried out in isolation in Namibia will not affect the core elephant populations from whence the problems emanate.

Perhaps a shift in thinking is needed away from narrow preoccupations with biological diversity to a fuller consideration of the opportunities presented by the current situation. In the previous section, the exodus of elephants from Botswana and north-western Zimbabwe was portrayed as a challenge rather than a problem.

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[4]For example, in the multiple use zone of Bwabwata.

[5]For example, removal of the international boundary fence along the southern boundary of Bwabwata and along the eastern boundary of Khaudum and Nyae Nyae would greatly facilitate east-west linkages in the regional elephant range.

[6]In a study of the Caprivi Region, Schlettwein (*et al.* 1991) saw the greatest threat to large wild herbivores as the extreme grazing pressure exerted by 96,000 head of cattle – a number which the authors expected to rise to 260,000 by 2000.

[7]In 2003 there were 253 separate incidents involving elephants in the Caprivi and 985 recorded instances of crop damage.

The importance of creating conditions which allow wildlife to compete with domestic livestock as a form of land use is referred to in several places in the *Background Study* and it might be salutary to consider how cattle farmers would react to the present situation if the focus were on cattle and not elephants. If, within the midst of a group of cattle farms, one farmer produced an overabundance of cattle to the extent that the beasts moved onto adjacent properties and, if that farmer made no effort to recover his cattle and was not overly concerned about his neighbours making use of the plentiful resource, the normal human reaction would be to accept the bonanza and use it. It is proposed that exactly this attitude should be adopted by the Namibian authorities towards the elephants in the north-east. Namibia should take full advantage of the opportunity presented by the overflow of elephants from the large and thus far unmanaged elephant populations of Botswana and Zimbabwe. The justification is that elephants are causing significant hardships for people and threatening conservation objectives in the north-east.

Namibia's short-term problem is to accommodate the increase in elephants, which is currently happening. Elephants have a propensity to eat themselves (and other species) out of house and home no matter how great the range available to them – a process which culminates in population crashes. In the long term, population reductions may be necessary. In the north-west, the management requirement may simply be to increase the range available to elephants: in north-central and north-eastern Namibia not only does the range need to be increased but, in some areas, the population may need to be reduced (**Fig.1**).

Technically, there are no good reasons why more land in Namibia should not be made available to elephants. The highest valued land uses over most of this arid country (**Map 3**) are those based on management of natural resources (Brown 2004). Moreover, the full potential is far from being realized at present due to national and international policy constraints, which place wildlife at a competitive disadvantage with land use based on exotic species. Were subsidies to be removed from the domestic livestock industry and, were it possible for elephant to play their full economic role in land use systems, it could reasonably be expected that large additional areas of land would be converted to wildlife management where human densities are relatively low and where co-existence with elephants is possible, as elsewhere in Namibia – for example, in most of the northern Kavango, parts of the central northern regions and in eastern Caprivi. This would remove the short-term limiting factor of providing additional range for elephant.

The technical arguments for greater areas of Namibia to be put over to natural resource management will not, on their own, bring about the needed changes to remove this limiting factor for elephants. It will require a high level of political commitment and the correct suite of incentives to induce landholders (both communal and private) to convert to a land use based primarily on wildlife. The high- level political commitment is already in place. In a speech delivered on 3rd February 2004, His Excellency the Founding President, Dr Sam Nujoma, made the visionary statement that wildlife would be restored throughout the north of Namibia, that ownership of wildlife would be conferred on local peoples and that the economy would be transformed by diversification based on wildlife uses.

For elephants, two factors mitigate against realizing the President's vision. The first is that the full value of elephant commodities (ivory and elephant skin) cannot be realized

due to international trading constraints.[8] The second is that elephants in Namibia are effectively State property – which was clearly not the President's intent. These two major disincentives need to be addressed before the conditions for increasing elephant range will be achieved. The options for tackling the CITES constraints are discussed fully in section 2c of the *Background Study* and briefly under the *Strategy and Actions* in this plan. The devolutionary requirements for elephants are also dealt with under the *Strategy and Actions*. A threat to fulfilling the Vision lies in a possible perversion of the intent of policy during the course of putting it into practice (Corbett & Jones 2000).

Full devolution of rights over elephants to landholders (on both communal and private land) is a prerequisite for creating the correct suite of incentives for elephant populations to expand. It is a necessary but not a sufficient condition. As a result of the arid environment in Namibia, elephant have large home ranges and this has major portents for management, both within Namibia and across national boundaries. No single protected area is a self-contained range for elephants and, in the north-east, the national parks in Caprivi are small (e.g. Mahango, Mamili and Mudumu) and very much at the mercy of the land use surrounding them. The desirability of cooperation with conservancies and surrounding communal lands has been emphasized in all of the previous studies in this series.[9] A key difference between the institutions needed for elephant management in the Caprivi and those in the north-west is that they would have to include stakeholders who are not included in conservancies. Unlike the other species in Caprivi for which management plans have been prepared, elephant are not rare or endangered and, indeed, they are a threat to those species which are.

A process of 'scaling up' is necessary to match institutions with ecological imperatives (Murphree 2000). Large areas co-managed by the relevant landholders and occupiers will be necessary to provide viable ranges, to distribute the pressure of elephants on habitats and to allow population increase and expansion. The Vision Statement developed under the UNDP/GEF-assisted project in Namibia (UNDP 2005) provides for co-operation between stakeholders to achieve this far-sighted concept. Linkages would be established under a co-management system which would both secure and increase the available range for elephant (**Map 4**).

In the north-east, elephant population reduction may be necessary. However, there are no simple answers to the question of how many elephants need to be removed – either to conserve biological diversity or to reduce conflicts between humans and elephants. It would be a mistake to attempt to hold the elephant population of the north-east at some constant level (or, conversely, to attempt to maintain a constant harvest from it). Such a "Command-and-control" approach (Holling & Meffe 1996) is likely to have adverse effects on the resilience of ecosystems.

This all points towards a need for imaginative and innovative management. An acceptance is necessary that there are no scientific recipes which avoid all the pitfalls in what is a 'complex system'. The starting premise may be that the option of zero use is

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[8]Elephant are perhaps the only species where, if markets were working properly, the commodity value of an elephant bull is actually higher than the value which can be realized from trophy hunting.

[9]Martin (2004) stated that successful conservation of the wetland grazers was unlikely to be achieved without co-management institutions for the full extent of the floodplain habitats in the Caprivi.

not a reality – elephants will be harvested illegally and unsustainably if facile attempts are made to debar their use. The aim should be to avoid routine cropping or culling programmes which attempt to impose constancy on naturally fluctuating ecosystems and to introduce an element of randomness into the system. The challenge is to make it sustainable and this requires an adaptive management approach (Holling 1976).

Combining adaptive management with the arguments for co-management presents a classic situation where the principles of adaptive co-management in complex bio-economic systems (Ruitenbeek & Cartier 2001) need to be applied. The individuals who are most affected by elephants are those living in the north-east: together with the State authorities, they should decide how elephants should be managed.

Background and Rationale for the Management Plan

The African elephant has achieved huge prominence in global conservation issues in the past 20 years. Few other species are capable of arousing emotions, polarizing viewpoints and causing controversy to the extent that *Loxodonta africana* has done. In 1989, rightly or wrongly, the species was listed on Appendix I of CITES and legal trade in ivory was effectively banned. Because of the high profile of the species, every range country seeking credibility in the international conservation arena should have a management plan for elephant.

The southern African region holds more than half of the African elephant population and the largest concentrations of elephant are in a central zone extending across the continent between latitudes 15º-20º south of the equator. Within this zone, Botswana and north-western Zimbabwe hold some 200,000 elephants. The expansion of these populations into neighbouring countries is affecting biological diversity and human livelihoods. In recent years, divided opinions on the subject of elephant management have characterized debate in southern Africa and the situation is no less contentious than in the international arena. The topic is now in the political realm and demands for elephant management plans are coming from all stakeholders.

The 'elephant problem' is central in initiatives to create transboundary conservation areas in the region. The need for elephants to have access to far larger areas than those in which they are currently confined is recognized and, for many, TFCAs are seen as the solution to elephant population increases. Unfortunately, a lack of coherent land use planning in all of the participating countries[10] in the KAZA TFCA, coupled with a legacy of national boundaries which are an "outrage to geography and all common sense", (Fisch 1999) means that this TFCA will undergo a long and difficult birth. And shortly after parturition, the 'elephant problem' will rear its ugly head notwithstanding the additional range which is available. National management plans are needed to anticipate the reality that TFCAs will not solve the elephant problem.

Under the present Namibian environmental legislation, management plans are required for species which are rare or valuable and which share boundaries with neighbouring countries. Elephants are not rare but they are potentially valuable and, within multi-species wildlife systems, could provide a financial return which greatly exceeds that possible from alternative land uses. A management plan which treats elephants as the

[10]Angola, Botswana, Namibia, Zambia and Zimbabwe.

valuable resource that they are could generate sufficient income to meet the conservation costs of the elephant range in Namibia.

This plan has no relationship to standard Government five-year budgeting plans – except insofar as the required operational expenditure for State Protected Areas needs to be maintained continuously above the minimum threshold needed for effective management and law enforcement. The achievement of a greater range for elephant and the capacity to carry greater numbers of elephant is subject to many factors being favourable – including success in conservancy development, a reversal of the present spread of unplanned settlement and land clearance, mitigation of the effects of veterinary fences and the creation of institutions with local stakeholders that allow co-management of elephant populations over substantial areas.

Plan Structure

In each of the preceding species management plans under the Transboundary Mammal Project, it has been found necessary to make minor adjustments to the *pro forma* layout that formed part of the terms of reference. Some additional small changes have been made in this plan – to suit the specific requirements for the species.

The style of the plan differs slightly from previous plans. Throughout the text, there is more narrative discussion and less of the conventional 'bullet point' approach. Recognizing that any decisions to manage elephant are potentially controversial, the plan gives due weight to the concepts and philosophy on which management should be based. The plan advocates that elephant management decisions are made in a co-management forum with other primary stakeholders and, because of this, it is impossible to predict in advance what those decisions will be or to spell them out in a concise sequence of required activities. The emphasis is more on predicting the outcomes of certain actions rather than advocating particular management interventions.

(1) The plan begins with a **VISION STATEMENT** which incorporates a **GOAL** and three objectives – a **SOCIAL OBJECTIVE**, an **ECOLOGICAL OBJECTIVE** and an **ECONOMIC OBJECTIVE.** The Vision builds on evolving Namibian policy.

(2) A set of **ACTIONS** needed to achieve the objectives follows and, taken together, these actions comprise the **STRATEGY**. The points are made that complex interactions exist among the objectives that are not amenable to 'linear programming' and an **ADAPTIVE MANAGEMENT** approach is needed for all interventions.

(3) The **RISKS AND ASSUMPTIONS** implicit in the plan are then detailed – the most severe risk being that attached to doing nothing.

(4) **FINANCE AND CAPACITY**: In previous plans detailed budgets have been prepared for implementation – based on the assumption that the plan might be submitted for donor funding. This plan is unique in that the income from elephants should more than meet all implementation costs and it is recommended that the plan is not submitted to donors. An estimate of typical income from elephant management is presented in **Appendix 1**.

(5) The key issues on which **TRANSBOUNDARY COOPERATION** is desirable are highlighted, and it is noted that the principles on which this management plan is based could be extrapolated to the larger scale of a trans-frontier conservation area.

MANAGEMENT PLAN

VISION, GOAL AND OBJECTIVES

This Vision Statement consists of a preambular section and an operative section in which the overall goal and objectives are stated. Following the Vision Statement, a sequence of actions is presented which, taken together, comprise a strategy to achieve the objectives.

This is the Vision Statement of the MET and not necessarily that of the other primary stakeholders in Namibia – who are those people in communal lands and on private land where elephants occur. For this reason some care has gone into the phrasing of the Vision Statement so that the State does not appear to speak on behalf of the other stakeholders with whom it hopes to enter into co-management arrangements. The overall goal makes it clear that the Ministry will be guided by the wishes of the other stakeholders.

If it were adopted, this Vision Statement could be seen as Government's policy for elephants. Several points need to be made: –

(1) Notwithstanding any sensitivity to other stakeholders, it is completely valid for Government to state its policy. The assumption is that the policy is already informed by the wishes of the stakeholders.

(2) Policy is a statement of Government's intent and, as such, it should be focused on the larger issues and not burdened with details.

(3) Policy precedes legislation. Laws are made to give effect to policy.

(4) Policy is essentially experimental and, at the outset, there should be an awareness and acceptance that it may need to be changed. Implementation of policy is 'adaptive management' at the highest level (Lee 1993).

VISION

RECOGNIZING that elephants are of global, regional and national conservation concern;

CO-OPERATING with neighbouring countries and the international community to achieve the security of the species and enhance its biological status;

PARTICIPATING fully in transboundary initiatives which, *inter alia*, will extend the range available to elephants;

REGARDING the elephant as a highly desirable species to be conserved as part of the biological diversity and natural wealth of Namibia and noting that there are unique adaptations among Namibian elephants to arid environments;

RECORDING the fact that Namibia has a secure and viable population of elephants which is expanding at the moment and becoming overabundant in some areas;

WILLING to continue to commit public funds to the promotion, protection and management of the species;

BEING AWARE that in recent historic times elephants were found throughout Namibia but that to return to this situation will require a high economic value to be attached to the species;

PROMOTING wildlife management as the optimum land use in the arid environment of Namibia and treating elephants as one of many valuable species in the diverse large mammal community occurring in Namibia;

NOTING the potential financial and economic contribution that elephants could make as part of wildlife-based land use were it not for national and international policy constraints;

DRAWING ATTENTION TO the high costs entailed in conserving the species that include the damage that elephants inflict on human livelihoods and the reduction in biological diversity that results from an overabundance of elephants;

EMPHASISING that a policy of total protection for elephant will result in their available range being reduced to State protected areas and a corresponding decrease in their numbers;

CONVINCED that a policy of sustainable use, as enshrined in the Namibian constitution, will result in the expansion of the range available to elephant and an increase in their numbers;

Accordingly, the Ministry has the following goal and objectives –

STRATEGY AND ACTIONS

Simple as the objectives are, they will not be achieved by 'linear programming' within each objective. To achieve the ecological objective of increasing elephant range requires certain actions to be taken in the social and economic categories. The social objectives of reducing conflict and achieving a flow of benefits require actions to be taken in the ecological and economic realms. The full economic objective will not be achieved until all of the other objectives are in place.

While all the actions and outcomes appear to be inextricably linked, it is possible to present them in a sequence which leads logically to the achievement of the objectives.

GOAL

Namibia wishes to carry the maximum number of elephants that is consistent with the conservation of biological diversity AND the wishes of those primary stakeholders who have elephants on their land

SOCIAL OBJECTIVE

1. **To reduce conflict between elephants and people**
2. **To create conditions under which elephants are a benefit to people**

ECOLOGICAL OBJECTIVE

1. **To increase the range available to elephant**
2. **To conserve biological diversity in State Protected Areas and promote the conservation of habitats outside State Protected Areas in the elephant range**

ECONOMIC OBJECTIVE

To enable the full economic potential of elephants to be realized according to the provisions for sustainable use in Namibia's Constitution

The actions, when taken together, comprise a strategy and this is outlined below as shown in **Fig.2**.

A feature of this management plan is just how few actions are needed to bring it to fruition. Success relies on a few administrative masterstrokes which will cost next to nothing – rather than on a long list of expensive management activities.

(1) **Devolution**

Devolution of authority for landholders, both communal and private, to manage elephants on their land is a prerequisite for the other stages in the management plan. Co-management arrangements cannot be entered into as long as the stakeholders around the table (other than the State) have no rights over the species. It will be impossible to create the conditions under which the elephant range can expand without the correct suite of incentives – which includes full empowerment at the outset. The State does not have the answers as to how many elephants there should be in all the parts of the range (and there may be no right or wrong answers) and it needs the other stakeholders to help to decide this.

Many planners and bureaucrats see devolution of authority as a step-by-step process where communities are granted powers incrementally as they demonstrate the ability to manage. This is a 'Catch 22' situation (Murphree 2000). Authority is a prerequisite for responsible management and should not be held out as the reward for it. In some cases, State authorities cannot see why the end goals of wildlife management require complete devolution. Devolution carries with it the responsibility for organization, management, control, self-sufficiency and, above all, for developing resourcefulness. These attributes cannot be imposed. They must be developed experimentally in the local setting and, without authority, such experiments are defective. The stimulus for the development sought within this management plan will arise not from the anticipation of future entitlement but from the imperative of immediate empowerment.

The MET may fear that complete devolution of authority for elephants could have wider ramifications – establishing precedents that would affect all other large mammal species in Namibia. This need not necessarily be the case. The devolution could be clearly labelled as 'experimental' and justified by the current prominence and urgency of elephant issues. In any case, the Ministry hopes that shortly after devolving these rights, it can enter into co-management arrangements in different parts of the elephant range – this will probably result in stronger controls on elephant exploitation than could be implemented by the State on its own.

In Zimbabwe during the 1970s and 1980s, wildlife authority was almost totally devolved to landholders except for Specially Protected Species (a legal category of wildlife where the State retains powers to control exploitation). Elephants in Namibia are in such a category. It is of interest that, in the years after devolution, all wildlife species increased in abundance except for Specially Protected Species. By limiting the rights of landholders to hunt, crop, breed, capture, translocate and sell these protected species, the incentives were not present to bring about their increase. Elephants are abundant in Namibia and there is no sound conservation reason why they should be classified as specially protected. Perhaps the only legal control that needs to be maintained is that of ensuring that all ivory is sold through the central Government outlet in order to satisfy CITES accountability requirements.

(2) **Veterinary control fences**

The influence of veterinary fences on the current elephant range, both in Namibia and in the region, is profound. There is a bottleneck in the vicinity of Mahango Core Area within Bwabwata National Park that affects the entire regional range for elephant across the central southern African region, (**Map 5**) caused by the veterinary fences on the southern boundary of Caprivi and along the international border between Botswana and Namibia. The compression of elephants in this narrow isthmus has undoubtedly been responsible for the woodland destruction in Mahango. This is a matter for the MET to pursue from the outset of the management plan.

The recent migration of elephant into Namibia indicates that these fences are less than effective. The boundary fence between Khaudum and Botswana is frequently breached over a large section (Beytell *pers. comm.*) and the fence on Caprivi's southern boundary is in a similar state (Booth *pers. comm.*). However, there should be little cause for elation over this: the fences undoubtedly impede movement of elephants up and down the Kavango River and act against the maintenance of spatial linkages between the subpopulations. There is a danger that the authorities in both countries will suddenly become conscious of the *status quo*, attempt to repair the fences and, at the same time, demand that elephants are killed as problem animals.

Cumming (2005) has called for the veterinary profession to re-examine its methods of disease control as the southern African region moves into transboundary wildlife management over very large areas. Methods of control that were developed in the 1960s and applied at national levels may no longer be appropriate at the international scale where collaborative efforts are being made between governments to move to the higher-valued land uses offered by wildlife tourism.

(3) **Constraints on trade**

CITES constraints on trade in ivory and elephant products are exerting a negative effect on Namibia's aspirations for conservation of elephant and, more generally, acting as a disincentive to the adoption of wildlife management as a primary form of land use.

The listing of the Namibian elephant population on Appendix II of CITES is accompanied by an annotation which makes trade in ivory and other elephant products very difficult. The achievement of full market prices for elephant commodities is needed to realize the ultimate objectives of this management plan. For this reason, the removal of the particular constraints affecting Namibia should be tackled with renewed vigour by the Government at an early stage in the inception of the management plan.

The options open to Namibia to achieve the removal of the current CITES annotation limiting its ability to trade are discussed in the *Background Study* and it may not be strategic to present them here. One of the options is to accept the *status quo*. The perspectives included in Namibia's submission to the 13th CITES meeting in Bangkok in 2004 to amend the annotation affecting Namibian elephants (MET 2004) are extremely powerful and provide the justification for rejecting this option. Namibia has reiterated its determination to oppose measures imposed externally that act detrimentally towards conservation, local people and national development.

It cannot be denied, however, that there are substantial values to be derived from elephants through tourism and international trophy hunting (which is not debarred under the Namibian annotation) even if they fall short of the ideal. The management plan is worth pursuing, even if the full value of elephant products cannot be achieved overnight and even if performance under the Economic Objective is lower than it should be.

(4) **Co-management**

Namibia continues to make huge progress in the development of conservancies on communal land. Namibia currently has 50 registered and about 20 emerging conservancies, with 220,620 people living in registered conservancies managing wildlife over an area of more than 118,704 km^2, including expanding elephant populations. The wildlife range on commercial farmland in the north of the country is increasing – particularly in areas where it is hoped that the elephant range can be expanded. These very positive developments are recognized in the Vision Statement of UNDP (2005) and are seen as a way to link protected areas across the country and to provide a continuous range for elephants across the north of Namibia.

It is important that the momentum continues: further evolution of policy is needed to allow new co-management institutions for larger areas to emerge. The present mosaic of parks, conservancies and commercial farms provides a sound and essential foundation for the 'scaling up' of institutions (Murphree 2000) and, as they stand, partnerships can be entered into among neighbours. But there is a difference between partnerships and full co-management institutions. The needs of elephant provide the vehicle for co-management – no tract of land in Namibia is large enough to be a self-contained management unit for elephant.

Ruitenbeek & Cartier (2001) would have it that a co-management institution cannot simply 'be imposed on a group of innocent bystanders'. It is something that should emerge naturally from a complex bio-economic system. The devolution of rights over elephants creates the conditions for emergence – it should stimulate the formation of institutions based sensibly on geographic areas. Here, too, there is scope for applying another principle – *no institution should be larger than the problem it is trying to solve* (Martin 1999b). Each new co-management institution should be related to the range of an elephant subpopulation and should include only those stakeholders on whose land elephants occur (which would include, in some areas, communal residents who are not organized into conservancies). The high-level institutional structure proposed for the State wildlife agency under the MET/UNDP/GEF project (UNDP 2005) is ideally suited to this from a geographical perspective. The new divisions, subdivisions and sections are well-matched to the elephant ranges that will require co-management institutions.

The State will be part of each co-management institution formed to manage elephants but its new role should be very different from a 'command-and-control' function. The operating point on the management continuum defined by Ruitenbeek & Cartier (2001) should be close to the *laissez faire* end of the spectrum.

At an early stage in the formation of the co-management institutions, a voting procedure may need to be established that could be based on the size of the landholding for which each stakeholder is the responsible authority within the elephant range. On this basis, the State might dominate decision-taking in the north-west: in eastern Caprivi, where Mudumu and Mamili national parks are relatively small, the communal land stakeholders should have the major say.

(5) **Adaptive management**

At this stage management interventions required in north-western Namibia are minimal: elephant densities are low and the population is in the process of re-colonizing its former range. Perhaps the only agenda for a co-management institution would be the allocation of trophy quotas.

In north-eastern Namibia, the migration of large numbers of elephant from Botswana, habitat modification in national parks and escalating levels of conflict between humans and elephants may require significant management interventions. The co-management institutions[11] in the north-east would need to address trophy hunting quotas, problem animal control (PAC) and population reductions.

Trophy hunting

In the absence of any other management (including PAC), the proportion of an elephant population that can be hunted for trophies is about 0.5%. These trophies would all be males over 30 years old. If the north-eastern population is about 16,000 animals, the maximum trophy quota would be about 80 animals of which 50 would come from the Caprivi and 30 from the Khaudum/Nyae Nyae area.

These might be the quotas set from 2007 onwards. Under adaptive management, the ages of the elephants killed should be monitored and, in succeeding years, the quotas should be adjusted upwards or downwards according to the criterion that there should be some animals among those killed that have reached an age of 40 years. If monitoring were based on tusk weights (which is considerably easier), there should be several tusks greater than 22 kg in the quota and the average tusk weight should not be much less than 19 kg.

Under a co-management system, it would not be necessary to allocate hunting quotas to particular conservancies or protected areas. The total income from all the trophies could be shared according to landholdings (or other agreed criteria) at the end of the year.

The sustainable off-take of trophy hunting quotas is affected by any other management interventions taking place at the same time (PAC and culling) and the effects are discussed below.

Problem animal control (PAC)

If PAC is restricted mostly to male elephants 15 years and older, the maximum sustainable off-take is about 1.5% of the total population. As the problem animal off-take is increased, the trophy hunting quota must be reduced to remain sustainable and, when the level of PAC reaches 1.5%, there are insufficient animals reaching an age of 30 years to allow sport hunting. The relationship is shown in the table below.

PAC off-take %	0	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	1	1.1	1.2	1.3	1.4
Trophy off-take %	0.50	0.45	0.40	0.36	0.32	0.26	0.22	0.18	0.12	0.11	0.08	0.05	0.03	0.02	0.01

Percentage off-takes are of the total population

The present system for dealing with problem elephants is clearly unworkable, particularly in the Caprivi. Elephants identified as problem animals must first be offered to a hunting concessionaire. The professional hunter is not allowed to shoot after dark which means that on most occasions the offending animal will not be killed in the act of crop raiding. If the hunter is unsuccessful in selling the animal as a trophy to a hunting client, MET staff

[11]There would probably be three such institutions in eastern Caprivi and Kavango.

may then destroy the animal subject to the current delegations of authority by the Minister.

Under a fully devolved co-management system, each stakeholder might be responsible for PAC in his/her landholding or authorized control officers would be present as needed in different parts of the area.[12] Being aware of the impact of PAC on trophy hunting, the co-management committee might prescribe guidelines to minimize the number of animals killed.[13]

Population reduction

Culling entails the removal of entire elephant herds with the aim of reducing population numbers or limiting the rate of population increase. By removing entire herds, the age structure of the female segment of the age pyramid remains unaltered and no selective pressures arise from the practice. The overall age structure of the population does become skewed in favour of males and this permits a higher percentage quota for trophy hunting, although it does not result in a greater number of male trophies over a period of years than would be obtained from a population which is not subjected to culling (because of population growth).

For a population growing at 4.6% per annum (a typical growth rate for savanna elephant), **an off-take of 3% of the total population will stabilise numbers**: a higher percentage off-take will reduce the population. This entails an off-take of about 30 animals for every 1,000 animals in the population. If culling is combined with trophy hunting, quotas can be raised to 1% of the population and an additional 10 males over the age of 30 years would also be removed annually.

If the sole consideration of the MET was to limit vegetation damage inside national parks, it might not seem necessary to confer with other stakeholders on any management decision to reduce elephant numbers in State protected areas. However, given the movements in and out of parks, a more sensible strategy is to manage the population both inside and outside parks with the other stakeholders for multiple objectives.

There are no simple prescriptions for the 'correct elephant densities' either to conserve biological diversity or reduce levels of human/elephant conflict. The worst mistake that could be made would be to attempt to hold the elephant population of the north-east at some constant level or to attempt to maintain a constant harvest from it – because this has adverse effects on ecosystem resilience. The rational approach is adaptive management (Holling 1976). Learning will only occur by exploiting the resource (Hilborn & Ludwig 1993) and monitoring progress towards the desired situation. By joining with

[12]In the late 1960s and early 1970s a PAC system which was in place in Caprivi where Chiefs Mamili and Liswani III (Salambala) had their own hunters authorised to hunt problem animals and obtain meat for feasts. These hunters were armed with .458 and .375 rifles. A quota was issued to each chief, problem animals were reported and dealt with within 24 hours, the tusks from the problem animal were registered, sold on the chiefs' behalf and the funds were deposited into the chiefs' account for community development. The system worked well (B. Beytell, *pers. comm.*).

[13]If commodity markets for elephant products were functioning properly, there would be little financial advantage in selling an elephant as a sport hunting trophy – the same animal would earn as much killed as a problem animal.

other stakeholders in deciding the nature and extent of any management interventions, the MET will place itself in a strong political position both nationally and internationally. The implementation of any population reductions will not be difficult to defend since the decisions will have been taken democratically.

Cropping

Namibia has stated firmly in its submissions to CITES (MET 2004) that no elephant will be killed for the sole purpose of realizing its value in the ivory trade.

Throughout Africa, elephants have been killed by local peoples for both ivory and meat for centuries. One of the primary reasons that colonial powers sought territories in Africa was because of the natural wealth of ivory (Parker 2004). Ansell (1960, page 50) remarks on the damage to crops in the Luangwa Valley, Zambia, but notes that elephant were seen by local people as valuable animals because of the meat they provided.[14]

It would be as well for MET to enter any co-management forum with no preconceived moral position on elephant. Having accepted that the solutions to the current 'elephant problem' may lie in innovative management inspired by the values of local people, a *tabula rasa* is needed to accept with an open mind all options presented.

The above actions comprise the strategy for elephant management.[15] Two of the actions are no more than enlightened administrative decisions to be taken within the Ministry. The veterinary fence issue requires the MET to confer with the Directorate of Veterinary Services in Namibia and carry its representations into the transboundary forum with Botswana. The ongoing struggle with CITES lies in the political and administrative realm. The adaptive management decisions affecting exploitation of the elephant population are not for prescription in this management plan: they will emanate from the enlarged forum of co-management institutions. They will take into account a wider range of social, ecological and economic factors than have previously characterized elephant management and, because of this, there is a real opportunity to advance knowledge on elephant management.

The objectives in the Vision Statement should be realized sequentially.

> **Ecological objective 2**, that of conserving biological diversity, should be the first to be realized since it is not dependent on achieving the full financial value for elephants. It requires only pro-active decisions from the co-management forums. It will, of course, result in costs which may have to be met from the fiscus in the first instance: however, as success is achieved in the CITES forum, the costs of ongoing population reductions can be met from the return from elephant products.

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[14] In the 1960s, every local person in the Luangwa Valley received a half-pound of meat weekly from elephant control.

[15] In the discussion of limiting factors the provision of artificial water, competition with cattle and the effects of veterinary fences were mentioned as additional factors influencing elephant populations. These are discussed more fully in the *Background Study* (pages 65-66) together with the effect on habitats of elephants and fire acting in combination. Rather than deal with these as stand-alone topics in this management plan, it is preferred to treat them as agenda items to be addressed by co-management institutions.

Social objective 2, that of elephants benefiting people, should be realized next. The full suite of benefits will only be realized when elephant commodities achieve their real market value: however, sufficient benefits may flow in the early stages from trophy hunting, PAC and population reductions to maintain the positive momentum needed to achieve the other objectives. An important factor enters the equation here. Once the stakeholders feel secure that they really are in control of elephant management, the demands for quick financial benefits are likely to lessen and they will begin to think more deeply about the very complex problems involved in managing elephants.

Social objective 1 - that of reducing conflicts between elephants and people, should follow. Here, too, the effects of devolution will be paramount. As long as the stakeholders see elephant management as a State responsibility, it pays them to make a huge fuss about all elephant incidents which affect their livelihoods. Following devolution, the responsibility for solving the problem rests squarely in their court. And, for the first time, they will have to grapple with multiple competing factors which affect their livelihoods. If all elephants are eliminated, crop raiding problems will be solved: however, the larger income from good wildlife husbandry will also be lost. It must be remarked that there is little possibility of eliminating elephants: dispersal from the large Botswana population will replenish stocks continuously.

Ecological objective 1 - that of increasing the elephant range in Namibia, will depend on a number of factors. The achievement of the previous objectives should create the incentives for a transformation in land use. The State can assist at the national level by removing perverse incentives which favour other less productive forms of land use and, in particular, by bringing the veterinary fences issue under scrutiny. As transboundary wildlife initiatives gain momentum, economic multiplier effects should speed up the process, tipping the scales in favour of wildlife management. The international struggle over the ivory trade is unlikely to be won in the first rounds of the contest and may require incremental demonstrations of success to convince sceptics that policies are working.

The Economic Objective - that of achieving the full value of elephants over the maximum potential range in Namibia, is also dependent on progress with the previous objectives.

If the elephant range can be extended as far south as shown in **Map 4**, about half of Namibia (400,000 km^2) would contain elephants. If the full commodity values for elephant are finally achieved, under a sustainable use management regime involving elephant male trophy hunting and culling to prevent elephant population increase above a density of 1/km^2, the net financial return per unit area could be as high as US$3/ha (**Appendix 1**). The net income would be about US$120 million. Using the multipliers implicit in Barnes & de Jager (1995) the 'net value added' in economic terms would be more than double this amount.

Impacts

The impact of achieving the highest valued of land use is likely to be considerable – Namibia could improve its economy by an order of magnitude. It will provide the revenue for effective State conservation, elevate the standard of living for landholders with elephants and create the incentives for more land to be put under wildlife. Ultimately, it could revolutionize land use practices throughout the region and pave the way for TFCAs.

Monitoring

Monitoring of a range of specific biological parameters is implicit under adaptive management. The detailed requirements for making sport hunting quotas sustainable and achieving the aims of any population reductions are detailed in the *Background Study*. The 'Event Book' system (NNF 2004) is already producing the needed information for conservancies on conflict between elephants and humans. The annual record of revenues and incomes earned from State protected areas, conservancies and other communal land will provide the information needed to assess progress towards achieving the economic objective.

RISKS AND ASSUMPTIONS

Given the escalating human-elephant conflict and the extreme modification of habitats in north-eastern Namibia, the greatest risk to Government's position is to do nothing. The architects of Botswana's elephant management plan (DG 2004) have recommended that Namibia does not take a passive approach on the issue (G.C. Craig, *pers. comm.*). Failure to implement the necessary devolutionary measures and enter into co-management carries the real risk that local people will take matters into their own hands or, worse still, collaborate with illegal hunters from neighbouring countries.

Inactivity will not simply result in the *status quo* being maintained. Since the 1970s, elephant populations have collapsed in an apparently inexorable process across Africa.[16] Invariably it has happened in countries where the State asserts that it owns all wildlife and attempts to regulate all wildlife use. Murphree (2000) describes this 'Big Government' syndrome as one where the State's "authoritative reach exceeds its implementational grasp". The most spectacular population crashes have occurred in countries that have banned all exploitation of elephants, yet corruptly continued to feed the ivory trade (Parker 2004). These same countries have also been in the vanguard of those proposing an ivory ban.

There is little risk that any management interventions could have an adverse effect on the status of elephant populations in Namibia. Populations are expanding and being augmented by migration from Botswana and Zimbabwe. Provided the effects are properly monitored, experiments in management will provide a learning experience.

Assumptions

(1) Adequate funding will be available to the Directorate of Parks and Wildlife Management (DPWM) through the fiscus to maintain its essential functions in State protected areas (see FINANCE AND CAPACITY).

(2) Present legislation which prevents the devolution of rights over elephant will be amended.

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[16]AfrESG (1998) and Martin (1986) document the decline of elephant populations in various countries since the 1970s. Among the more spectacular population crashes have been those in Kenya, Tanzania, Uganda and Zambia.

(3) MET is willing to enter into co-management of elephants with legitimate stakeholders.

(4) The devolution of rights over elephant and the establishment of co-management institutions will create the conditions for an expansion of the present elephant range beyond State protected areas, create linkages between State protected areas and improve the security of existing populations.

(5) Botswana and Zimbabwe will not take steps to limit their elephant populations. Whether or not they do will have little impact on this management plan as an institutional structure will have been set up to cope adaptively with changing situations.

(6) Namibia will be successful in convincing the Parties to CITES that the democratic policy it is pursuing carries the greatest long-term prospects for conservation and rehabilitation of elephant populations. If this assumption is not satisfied, it does not invalidate the management plan: it simply means that the transition to higher-valued land use systems based on wildlife and the expansion of the elephant range will take longer.

Risks

(1) If the assumptions are satisfied, the risk of an outbreak of illegal hunting of elephants among Namibian citizens is minimal. However, successful conservation of elephants in Namibia may attract illegal hunters from outside its borders – particularly from poorer countries whose local peoples are not benefiting from wildlife.

(2) There is a real risk that veterinary control measures, even though not directed at elephant, could continue to prejudice the objective of expanding the elephant range. Without expansion of the elephant range, the problems of conflict between humans and elephants and damage to wildlife habitats will require more intensive management. The solutions to this problem do not lie solely within Namibia's borders and this risk becomes an externality. The establishment of robust democratic co-management institutions will greatly strengthen the Ministry's position in tackling the problem and, even if the *status quo* of veterinary fences does not change, management solutions may emerge from within such institutions.

(3) If Namibia alienates some Parties to CITES through taking extreme measures to re-establish its sovereignty over elephants, there may be reprisals that affect other aspects of financial aid to Namibia. This will have to be handled in the political realm. Namibia's moral position is strong and it will be a pity if pragmatism has to override morals – particularly where it prejudices long-term prospects for conservation and rural development.

(4) If Namibia undertakes management interventions that involve culling or cropping from elephant populations, there will almost certainly be a regional and international outcry. From the experience that Namibia already has with the publicity surrounding elephants, it takes no stretch of the imagination to visualize the extremes to which the propaganda might go.

It is here that co-management is vital. If Namibia can present to the outside world a unified position supported by its citizenry, it should be able to weather the storm.

FINANCE AND CAPACITY

This management plan differs from all previous species management plans in that very little funding is required to implement it. The main costs will lie in co-ordination (liaison in setting up co-management institutions) and implementation of any management activities that arise from co-management decisions (problem animal control and population reductions). The potential income from elephant management is substantial and should more than cover these costs. The State or primary stakeholders may have to advance funds for certain activities to take place and it is strongly recommended that this is the financial mechanism used. Because of the controversial nature of elephant management, it would be wise not to compromise any decisions taken between the Ministry and primary stakeholders by seeking either international donor funding or local NGO funding to support implementation.

The current project to strengthen the system of national protected areas (UNDP 2005) should provide the necessary funding and capacity for MET to carry out its normal functions, including law enforcement. The close alignment between the UNDP project and the management plan for elephant bodes well for forming co-management institutions. Under the project, northern Namibia would be managed under two main divisions: the north-west (which includes Etosha National Park) and the north-east (which includes the Bwabwata, Mamili, Mudumu and Khaudum national parks and Waterberg Plateau Park).

The income from elephants would be unable to contribute much to Government budgets for the north-west. There is no sport hunting of elephants in the State protected areas and no management interventions are proposed. Outside the State protected areas, income earned from trophy hunting accrues to conservancies rather than to the State.

In the north-east, elephant could play a significant role in meeting conservation costs. The potential earnings from an elephant population managed for trophy hunting while keeping numbers constant are given in **Appendix 1**. The extent to which this revenue would contribute to park conservation costs is shown below.

	Caprivi	Khaudum & Mangetti
Protected areas with elephants (km^2)	9,956	4,142
Required conservation budget under UNDP (2005) – N$ million	13.9	4.8
Cost/hectare N$	13.91	11.59
Potential revenue from elephant management N$/ha	8.71	8.71
% contribution of elephants	63	75
Present conservation budgets (approx) – N$ million	9.9	3.4
Allocation/hectare N$	9.94	8.28
Potential revenue from elephant management N$/ha	8.71	8.71
% contribution of elephants	88	105

It would more-or-less meet the present budget allocations for the north-east and would meet at least two-thirds of the budgets proposed under UNDP (2005). Even if the full value of ivory and elephant skin is not achieved, the revenue from sport hunting will provide some 75% of the amounts given in the table.

Over and above the revenue which would accrue to State protected areas (N$8.7/ha), an additional N$9.7/ha would be earned by safari operators. This figure is dependent on the assumed proportion of gross income that safari operators would pay the landholder (MET or local community) for the 'rental' of the trophy hunting concession including trophy fees. If a rental higher than 25% can be secured, the primary stakeholders would achieve a larger part of the total net income (N$18.4 per hectare) from this elephant management regime.

Over and above the costs assumed in Appendix 1, additional costs could arise for such items as the annual aerial census of elephant populations, provision of artificial water and control of fire. However, in previous species management plans (Martin 2002, 2003, 2004) detailed budgets have been prepared for these items and it would be duplication to resubmit them here. Moreover, to put forward budgets for management activities which are the prerogative of co-management institutions yet to be established would be premature.

TRANSBOUNDARY COOPERATION

Whilst recognizing the larger goal of creating a major transboundary conservation area extending from the north of Namibia eastwards through Angola, Botswana, Zambia and Zimbabwe, the initial strategy guiding the Transboundary Mammal Project was to build incremental initiatives with Botswana based on individual rare or valuable mammal species of common interest to both countries. Given the extensive range of elephants and the high profile of elephant issues in the KAZA TFCA region, the time may have come for the subject to be discussed in a broader consultative forum.

Most of the management activities identified for potential cooperation and collaboration between Botswana and Namibia at the Kasane Workshop (2002) and Windhoek Workshop (2003) repeat themselves in this Management Plan.

(1) Maintaining liaison between wildlife departments and communities managing wildlife on either side of the international border;

(2) Maintaining linkages between species subpopulations;

(3) Ensuring compatible forms of land use on either side of the international boundary;

(4) Expanding the available range for the species – which includes dialogue on veterinary control fences;

(5) Co-operating on law enforcement directed at illegal hunting;

(6) Controlling fire;

(7) Collaborating on aerial surveys to improve population estimates.

The issue of joint management of this species is a topic which has not arisen with the other species which have been the subject of transboundary dialogue. It would be highly desirable if a common management approach for elephants could be developed, in the first instance, between Namibia and Botswana but, after that, with the other countries sharing the elephant range.

So far, Botswana and Zimbabwe have not announced their intentions regarding elephant management. This plan is structured so that the management of elephants on Namibian soil is not dependent on decisions by neighbouring countries: It is, first and foremost, a national plan. However, if Namibia's neighbours expressed a wish to enter into large-scale joint management of elephants, there is nothing in the plan to preclude this. Indeed, Namibia would welcome the initiative. It is an extension of the co-management policy approach which Namibia will pursue at the national level.[17]

The corollary to this is that, if there is no agreement with neighbouring countries, it cannot reasonably be expected that Namibia will not undertake management interventions in the best interests of its local peoples and conservation imperatives. Namibia would, of course, keep its neighbours fully informed of its management decisions.

The management activities on which collaboration might occur are: –

(8) Setting hunting quotas and monitoring the sustainability of hunting

Both Botswana and Namibia allow sport hunting of elephants and the trophies are derived from a shared population. This is a test case for developing workable transboundary institutions which, in the first instance, result in cooperation on quota setting and, ultimately, lead to income sharing.[18] Some of the problems which might arise in co-management are (a) the fact that Botswana allows citizen hunting of elephants at reduced charges; (b) the present Botswana elephant quota is not distributed among areas in proportion to elephant population numbers (DG 2004, page 13); and (c) the uncertainty that exists about the relationship between trophy quality and quota setting.

(9) Problem animal control

With the escalating conflicts between humans and elephants in both countries, there are sound reasons to share experiences gained from PAC, including successful deterrents which do not involve killing elephants.

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[17]The issue may not be as simple as this. Namibia's co-management institutions would be based upon a far-reaching devolutionary policy. Co-management extending to neighbouring countries would need to be underpinned by the same principles for it to be entirely successful. The Utopian situation would be achieved when the TFCA was being managed jointly by local communities and their governments through a cascading structure of genuine co-management institutions.

[18]At the Kasane Workshop, the opportunity to develop such an institution involving Salambala Conservancy in Namibia and the Chobe Enclave community in Botswana was identified. These communities are directly opposite one another on the Chobe River and are almost certainly hunting from the same populations.

(10) Population reductions and/or sustainable harvesting of elephants

Although it was decided in 1991 to limit the Botswana elephant population to 60,000 animals, no population reductions took place (DG 2004, page 4) with the result that the population is now in the vicinity of 150,000 animals. Most rural communities in northern Botswana feel that there are too many elephants and that the number should be reduced (DG 2004, page 10). However, the practicalities are daunting: it would require the removal of some 5,000 animals annually simply to prevent further increase.

From the perspective of those Botswana stakeholders who seek to reduce human/elephant conflict and prevent further habitat modification, Namibia's removal of a substantial number of elephants in the Caprivi Region would be unlikely to achieve the desired objective. More likely would be a reduction in elephant dispersal and migrations through Caprivi causing increased pressure on habitats in Botswana. There are obvious grounds for collaboration.

Were Botswana to pursue a policy of consumptive utilization of elephants, the sustainable off-takes would be very high. DG (2004, page 12) estimate that the removal of 5,000 animals annually would yield about 20 tonnes of ivory, 4,000 tonnes of meat (wet weight) and 325 tonnes of dried salted hide. The constraints imposed by CITES reduce the value of this resource and lead logically to another area where collaboration would be beneficial.

(11) CITES constraints on trade in elephant products

At the time elephants were listed on Appendix I of CITES in 1989, a strong institution[19] was formed within the southern African region to contest the listing. At the Meeting of the Conference of the Parties in Kyoto in 1992, this alliance was able to introduce several resolutions which significantly affected the Treaty.[20] This institution was fundamentally altered in 1996 and, since then, has faded into obscurity. If the southern African countries still hold the fundamental viewpoint that all wildlife products should have value, there are strong grounds for resuscitating the alliance between states to perform more effectively in the CITES forum.

IMPLEMENTATION PROCESS & UPDATE PROCEDURES

Timing and Duration of Plan

Implementation of this plan should commence as soon as possible because of the rapidly changing situation of elephants in Namibia and the southern African region.

From the outset, an adaptive management monitoring programme should underpin the implementation of the Plan and test the underlying hypotheses regarding the response of elephant populations and habitats to various management interventions. The objectives, hypotheses and management activities in the plan should be modified as needed to take

[19]SACIM – the Southern African Centre for Ivory Marketing, which included Botswana, Malawi, Namibia and Zimbabwe and which maintained liaison with Mozambique and South Africa.

[20]Among these resolutions was one that recognised that trade could be beneficial for wild species and another that altered the criteria for listing species on CITES Appendices.

into account externalities which may arise (and almost certainly will arise) during implementation.

The first draft of this Species Management Plan was completed in April 2005 and was reviewed during April-May 2005. Following comments and decisions from the Directorate of Parks and Wildlife Management and the Directorate of Scientific Services in the MET, a second draft was submitted to the Ministry by June 2005. Subject to any further revisions which might arise from inter-ministerial discussions or transboundary liaison with Botswana, a Final Plan should be ready for adoption before the end of 2007.

This should be followed by meetings between the MET and primary stakeholders to discuss implementation. Central to the plan are the devolutionary aspects and the establishment of co-management institutions. Notwithstanding any modifications made as and when necessary during implementation, there should be a mandatory review of the plan every two years – preferably synchronized with the results from elephant population surveys. If any changes are needed in the plan, the document should be modified, updated and re-approved.

Appendix 1: Income from Elephant Management

The potential income from sustainable use of an elephant population management has been analyzed using the population model of Martin (2000). The management regime entails culling to prevent population increase combined with trophy hunting of males. Assumptions and formulae used in the model are as follows –

(1) The management treatment is applied to a population of 1,000 animals in an area of 1,000 km^2 (i.e. at a density of $1/km^2$). In the absence of any management this population would increase at a rate of 4.56% per annum. The percentage of the population to be culled is selected so that the population does not increase.

(2) Culling entails the off-take of complete elephant herds and includes males up to the age of 10 years. The probability of a male older than 10 years being present in a herd is set as: –

$$P_a = e^{-0.015\,(Age - 10)}$$

(3) An off-take of 3% of the population is sufficient to stabilize numbers. This percentage may seem low when taken from a population which, in the absence of culling, increases at 4.6% per annum. The explanation lies entirely in the preponderance of females in the off-take.

(4) It is assumed that 75% of all elephant calves between the ages of 2 to 8 years will be captured rather than killed. These would be sold to zoos and to approved local and regional buyers wishing to domesticate elephant or begin new wild populations.

(5) The change in the age structure of the population caused by culling allows a greater percentage quota for trophy hunting of males. A quota of 1% of the population is sustainable.

(6) To calculate the values of ivory, skin and meat obtained from the culling operation, the following formulae were used for males and females of specific ages: –

Ivory Weight of two tusks: –

$$I_{Age} = 1.88\,(0.1 + 0.2\,(Age - 2.5)^{1.2937})\ \text{kg}$$

$$I_{Age} = 1.88\,(0.1 + 11\,(1 - e^{-0.016\,(Age - 2.5)^{1.2742}}))\ \text{kg}$$

The multiplier for two tusks (*1.88*) is from Rodgers (*et al* 1978) and the formulae for the weight of one male and one female tusk are based on Pilgrim & Western (1986).

$$Price/kg = US\$\,(50 + 110 \cdot I_{Age}^{0.5})$$

Body weights

$$W_{Age} = 5{,}200\,(1 - e^{0.006\,(Age + 1.5)^{1.7}})\ \text{kg}$$

$$W_{Age} = 3{,}500\,(1 - e^{0.00892\,(Age + 1.5)^{1.7}})\ \text{kg}$$

Dressing out percentage = ***33%*** (wet weight); Price/kg wet meat = ***US$1.00***

Skin weight (dry, both sexes)

$$S_{Age} = 0.373\,W_{Age}^{0.67}$$ Price/kg dry skin = ***US$5***

The table on the next page gives the results of the management programme averaged over 100 years. It is assumed that markets for all products are operating normally.

FINANCIAL VALUE OF ELEPHANT MANAGEMENT PROGRAMME

Assumed values *(all figures in US$)*

Area	1,000	km^2	Exchange rate 1US$ = N$	6.2	
Elephant population	1,000	animals			

SPORT HUNTING

Trophy male quota	1.0	% of total population per year=	10	animals
Trophy fee US$	10,000	charged by operator		
Daily rate US$	1,000	charged by operator		
Minimum hunt days	14	Client charged for 14 days if elephant bull included in hunt		
Operating costs US$	200	per day (Safari operator's costs)		
Operator' rental	25	% of gross income (paid to landholder – MET or community)		
Weight of skin	100	kg dry skin/animal (assumes hunter takes 20% of skin)		
Body weight (adult male)	5,000	kg		

POPULATION REDUCTION

Culling quota	3.0	% of total population per year=	30	animals
Culling cost US$	300	per animal		
Calf capture US$	300	per animal (2-8 years old)		
Selling price for calves US$	1,000	per animal		
Capture success	75	% of animals 2-8 years old		
Price of skin US$	5	per kg (assumes markets operating)		
Dressing out percentage	33	% of body weight		

Meat value US$	1	per kg (wet weight)

Age-specific tusk weights, ivory prices, body weights and skin weights as per formulae on previous page

SPORT HUNTING

Safari Operator Gross income

Trophy fees	100,000
Daily rates	140,000
Skin	5,000
Subtotal	**245,000**

Operating costs

Operating costs	28,000
Rental	61,250
Subtotal	**89,250**

Safari Operator Net income **US$/ha**

	155,750	**1.56**
N$	*967,208*	*9.7*

MET or communityNet income

Rental	61,250
Meat	16,500
Subtotal	**77,750**

MET or communityNet income **US$/ha**

	77,750	**0.78**
N$	*482,828*	*4.8*

CULLING

MET or communityGross income

Ivory	38,350
Calf sales	14,630
Meat	12,696

MET or communityNet income **US$/ha**

	62,444	**0.62**
N$	*387,777*	*3.9*

Skin	5,768	**MET or community income**	**Total net**	**US$/ha**
Subtotal	**71,444**		**140,194**	**1.40**
Operating costs		*N$*	*870,605*	*8.7*
Culling costs	**9,000**			
		OVERALL TOTAL NET INCOME	**295,944**	**2.96**
		N$	*1,837,812*	*18.4*

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Martin, R.B. (2003). Species Report for Roan, Sable and Tsessebe and Species Management Plan for Roan, Sable and Tsessebe. Study and Draft Plan prepared for *The Transboundary Mammal Project* of the Ministry of Environment and Tourism, Namibia, facilitated by the Namibia Nature Foundation and the World Wildlife Fund LIFE Programme. 96pp and 26pp + 6 maps

Martin, R.B. (2004). Species Report for Reedbuck, Waterbuck, Lechwe and Puku and Species Management Plan for Reedbuck, Waterbuck, Lechwe and Puku. Study and Draft Plan prepared for *The Transboundary Mammal Project* of the Ministry of Environment and Tourism, Namibia, facilitated by the Namibia Nature Foundation and the World Wildlife Fund LIFE Programme. 78pp and 28 pages + 4 maps

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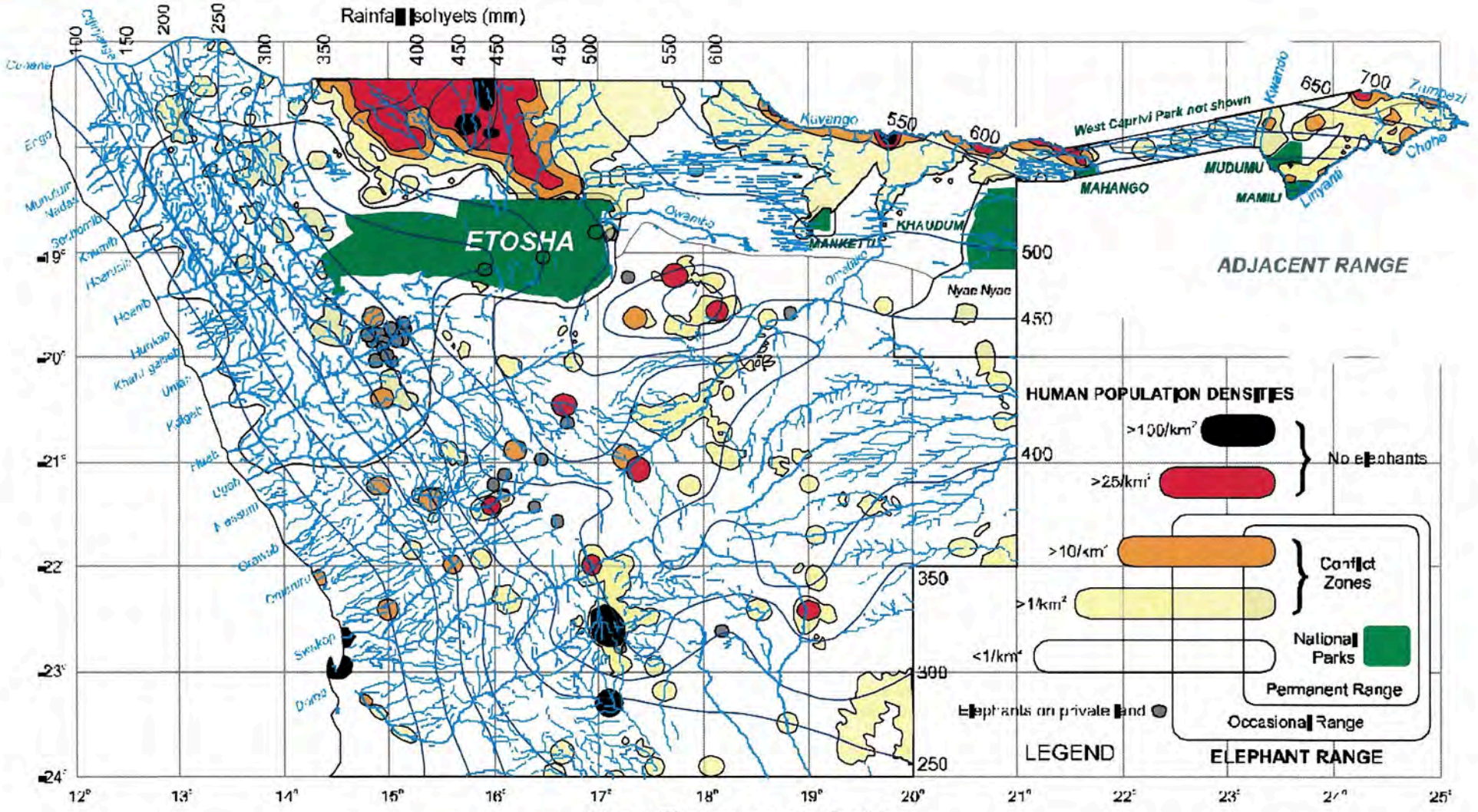
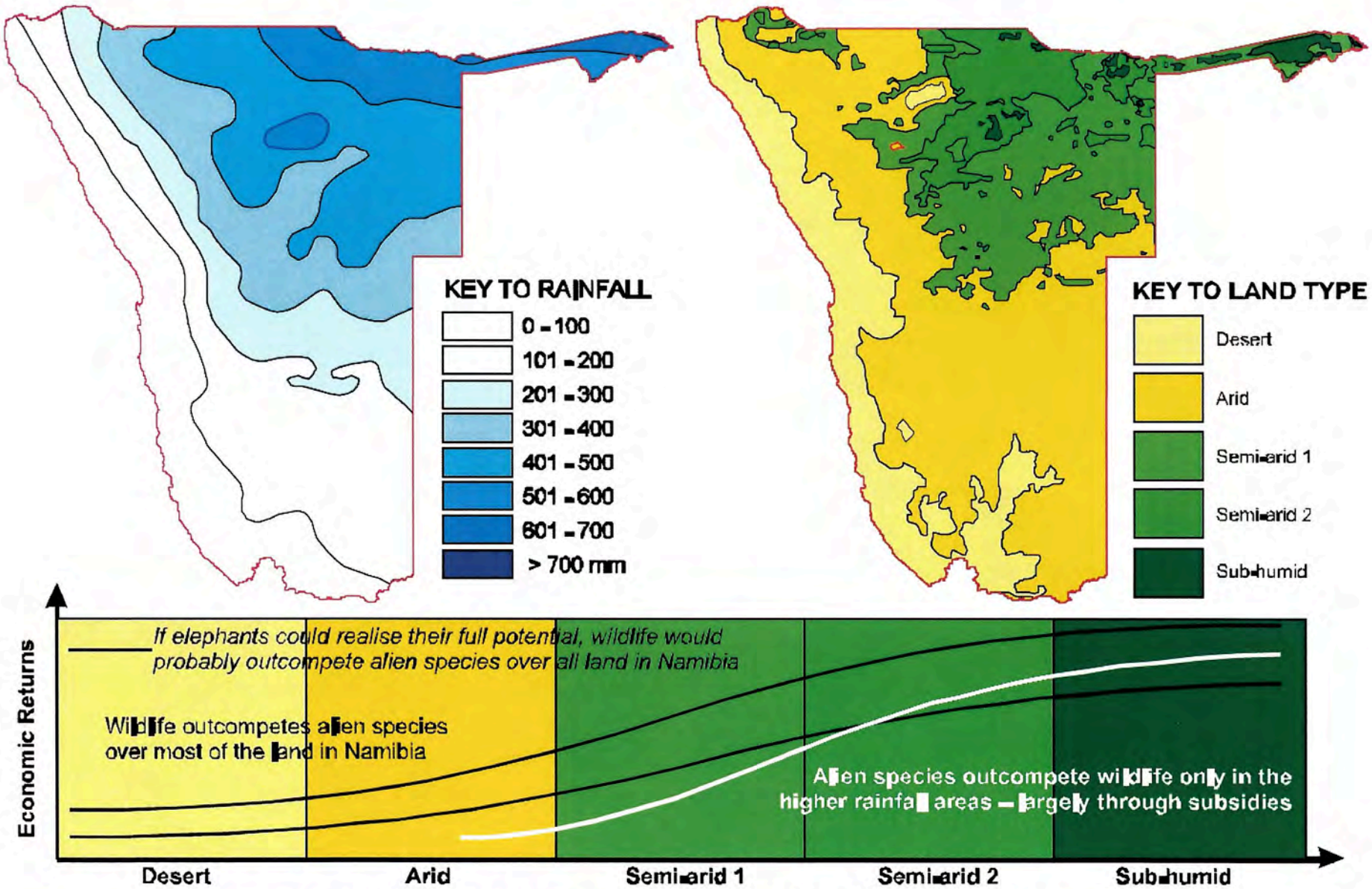
Map 1: Elephant range in southern Africa
based on AfrESG (2002)



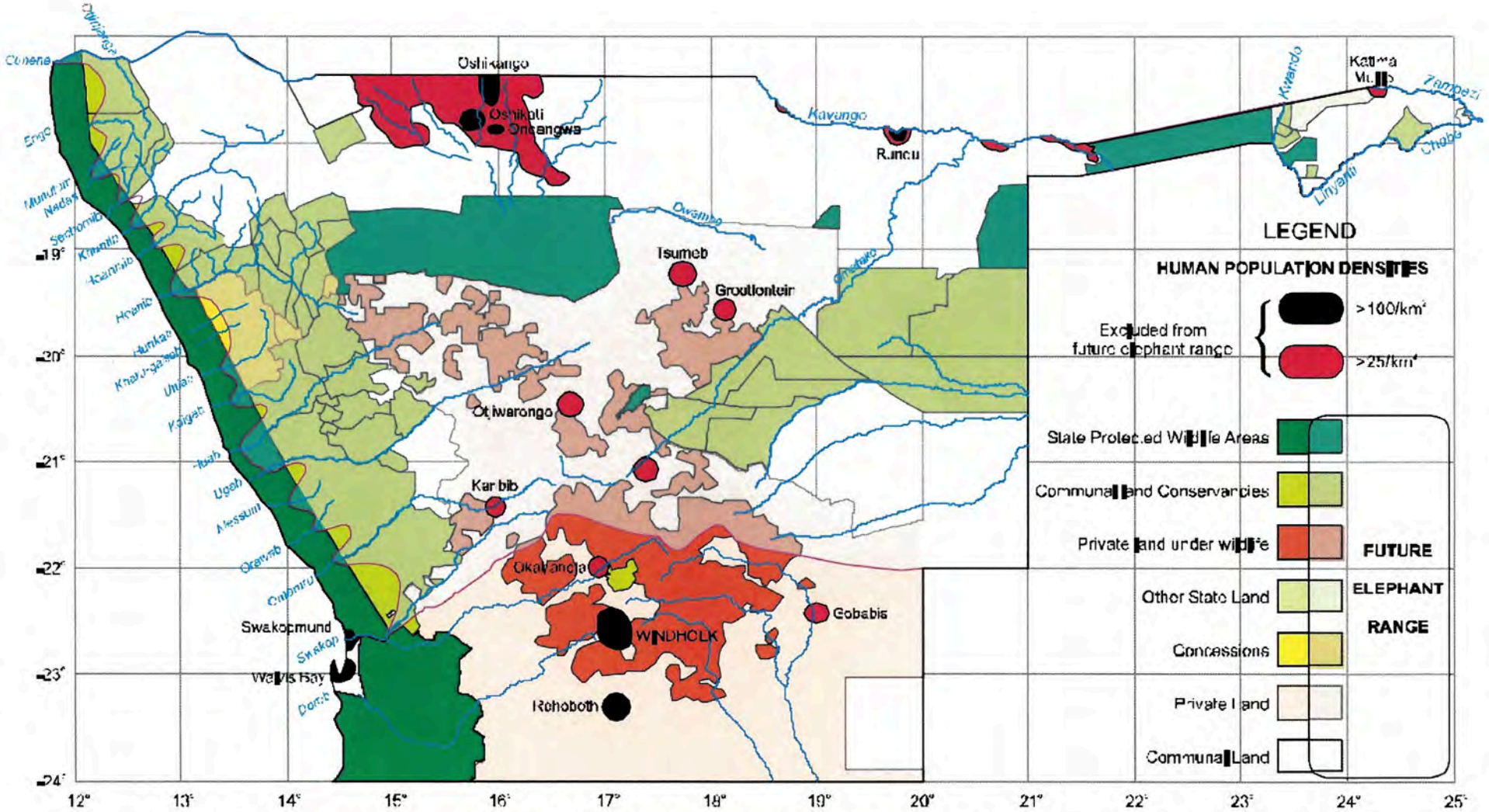
Map 1: Elephant range in Namibia

002443



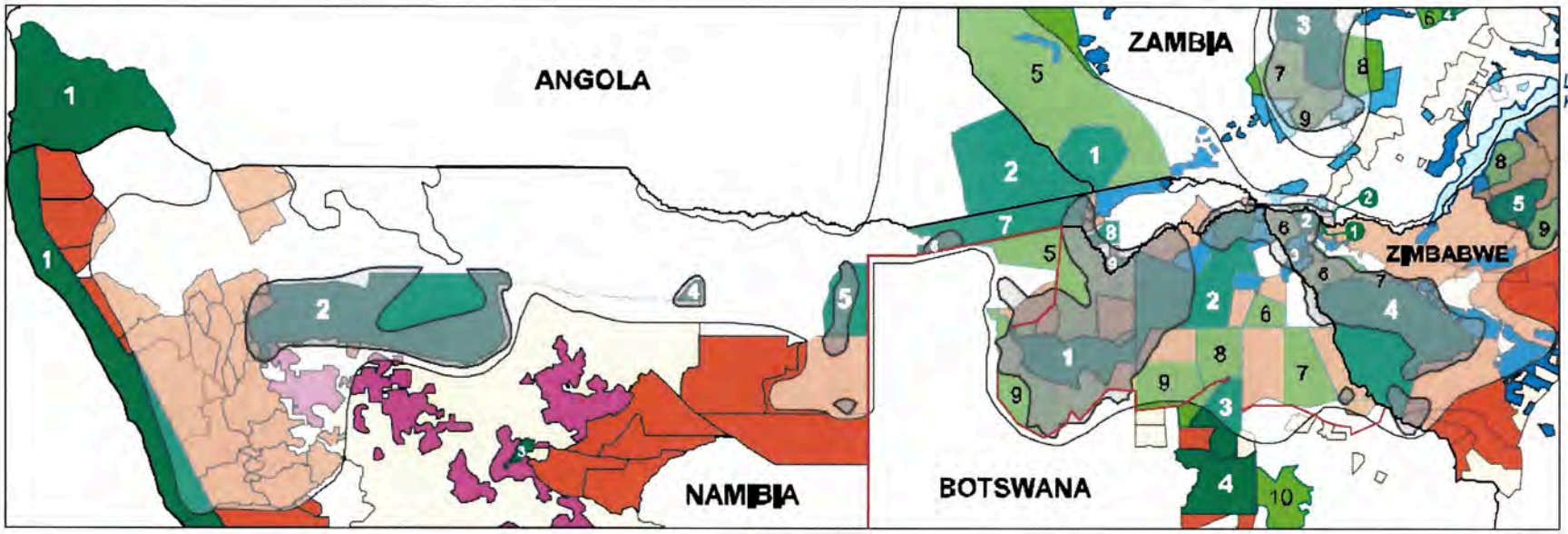
Map 3: Land capability and economic returns from land use in Namibia

002444



Map 4: The future range of elephants in Namibia ?

002445



LAND TENURE CATEGORIES

ELEPHANT RANGE

	None	Total Range	High Density
Communal Land			
Private Land			
State Protected Wildlife Areas			
SAs (Zw), WMAs (Bw), GMAs (Za)			
CBNRM, Conservancies (Na)			
Private Land Conservancies (Na)			
Forest Reserves			
Local Forest Reserves (Zambia)			

STATE PROTECTED WILDLIFE AREAS

ANGOLA
1 - Iona NP
2 - Luiana PR

NAMIBIA
National Parks
1 - Skeleton Coast NP
2 - Etosha NP
3 - Waterberg NP
4 - Mangetti GR
5 - Khaudum NP
6 - Mahango NP
7 - Caprivi GR
8 - Mudumu NP
9 - Mamili NP

BOTSWANA
National Parks
1 - Moremi GR
2 - Chobe NP
3 - Nxai Pan NP
4 - Makgadikgadi Pans

Wildlife Management Areas *with resident local communities*
5 - Kwando
6 - Nutiga
7 - Nata State Lands
8 - Ngami State Lands
9 - Okavango
10 - Botetli State Lands

ZIMBABWE
National Parks
1 - Victoria Falls NP
2 - Zambezi NP
3 - Kazuma Pan NP
4 - Hwange NP
5 - Chizarira NP

Safari Areas *(unsettled)*
6 - Matetsi
7 - Deka
8 - Chete
9 - Chirisa

ZAMBIA
National Parks
1 - Sioma Ngwezi NP
2 - Mosi-oa-Tunya NP
3 - Kafue NP
4 - Lochinvar NP

GMAs *(ADMADE)*
5 - West Zambezi
6 - Kafue Flats
7 - Mulobezi
8 - Bili Springs
9 - Sichifula

National Boundaries
Veterinary Fence

Map 5: The transboundary range of elephants in relation to the Namibian population

002446

[EXTERNAL] Supplement to import Permit Application #98648C- Bobby Lynch, Namibia- Elephant

Aimee Korver <permits@conservationforce.org>

Sun 6/28/2020 2:53 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>; (b) (6)
(b) (6)

3 attachments (9 MB)

ElephantManagementPlanNamibia.pdf; MahangoNPOperatorReport.pdf; SupplementBobbyLynch.docx;

Ms. Brisendine,

Please include the attachments provided as supplement to Mr. Bobby Lynch's import permit application #98648C.

Inluded:

-Supplement answers to question 9 of the application with attachments.

-Operator Enhancement Report for Mahango National Park

-National Elephant Management Plan for Namibia

Please let me know that you have received this e-mail and if you have any questions.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: Peter Thormahlen

   a. Years in business: 20

   b. Name of company conducting hunt: Thormahlen & Cochran Safaris

   2. Name of concession: **Mahango NP** **Size in km²: 30,000 ha**

   a. Land tenure: __ Government lease X__ Community _ Private ranch __ Private conservancy

   b. Length of concession agreement: 4 years Can it be renewed? __ Yes _X_ No

   c. Length of renewal, if applicable: Auction every 4-5 Years

   d. Estimated total amount received in trophy fees last year, if applicable: $400,000

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: Government Concession – none of the above required

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Nearest town is Divundu. Map, attachment 1,

   g. If the concession borders a national park, please provide the park name: _____Concession is Mahango National Park_____

h. Description of general and distinctive habitat features and any water features: Biotype is made up of Kanago River, Riverine Area, as well as Miombo Forest area

3. Are there any communities living in the concession? Yes _X_ No

   a. If so, estimated number of people or villages in the concession?

4. Are there communities bordering this concession? X_ Yes __ No

   a. If so, estimated number of people or villages around the concession? Divundu Town Area, Kavango Tribe

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	**abundance**	1,000-1,500	stable	MET Game Count Surveys
Lion	average	20	stable	MET Game Count Surveys
Leopard	abundance	100	upwards	MET Game Count Surveys

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Hippo	abundance	500	upwards	MET Game Count Surveys
Crocodile	abundance	1,500	upwards	MET Game Count Surveys
Roan Antelope	abundance	400	upwards	MET Game Count Surveys
Kudu	abundance	1,000	upwards	MET Game Count Surveys
Sable Antelope	abundance	400	upwards	MET Game Count Surveys
Prey species	Abundance: zebra, giraffe, baboon, Steenbuck, grey duiker, impala, reedbuck	7000+	upwards	MET Game Count Surveys

Wildlife monitoring in the Park is done by Ministry of Environment & Tourism (MEFT)

6. Total employment number: __5_____

   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	4	2
Trackers	4	3
Anti-poaching scouts/rangers	0	
Other anti-poaching	Namibia Game Department - MET	
Cooks/housekeepers	2	2
Community coordinators		
Managers	1	1
Biologists		
Others: _____	2	2

7. Number of staff employed in the off-season: 13 - anti-poaching excluded.

   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	0		
Managers	2	1	2014-2017
Maintenance	2	2	2014-2017
Road opening/construction			

Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: National Park -MET is doing Anti-Poaching

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both

   c. Months during which anti-poaching patrols are conducted: every month

   d. Number of anti-poaching patrols per month: Anti-poaching is done 24/7 in the National Park by Park Officials

   e. Description of anti-poaching equipment, vehicles, etc.: Patrol 4x4 cars and on foot.

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Namibian Government - MET

   g. Do you offer rewards to poaching informants leading to arrest? __ Yes _X_ No

   h. Do you offer rewards to poaching informants upon conviction? Yes _X_ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? The anti-poaching campaign done by Parks personnell

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts				
Equipment				
Vehicles				
Petrol				
Rewards paid				
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered				
Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated				
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered				
Other: _____				

The Game Department does not share information. Poaching is a sensitive issue and therefore no information in this regard is available to us to complete the above table. However, because of all the anti-poaching programs run in the area, poaching of antelope is zero, or so little that we don't know of any incidents.

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? _X_ Yes _ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? __voluntary and donated by our overseas clients – mostly USA citizens who donates school stationary to schools in the area.

c. Does the company provide game meat to nearby communities? x_ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: All the game meat hunted by us and as per the allocated quotas of the Minister of Environment and Tourism, go to the local community

Yearly the following Game is harvested:
Elephant x 2 @ 4,500 kg per carcass @N$22 / kg = N$198,000
Hippo x 4 @ 1,500 kg per carcass @N$22 / kg = N$132,000
Buffalo x 4 @ 800 kg per carcass @N$22 / kg = N$70,400
Kudu x 2 @ 120 kg carcass @N$22 / kg = N$5,280
Giraffe x 1 @ 750 kg carcass @N$22 / kg =N$16,500
Sable x 2 @ 150 kg carcass @N$22 / kg =N$6,600
Roan x 2 @ 150 kg carcass @N$22 / kg =N$6,600
Impala x 4 @ 50 kg carcass @ N$22 / kg = N$2,640

TOTAL = N$438,020.00

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.

National Park -Park Officials on duty

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in?

There is a Government Fund that refunds the community for damages.

Species	Damage caused	Consolation paid 2016	Consolation paid 2017	Consolation paid 2018
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____US$_____

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	$1,750	$3,500	$4,000	20 blue bags @ $200 per bag = $4000, or N$55000. Clients donate $200, we will up the bag to the total of $200 with the necessary school or educational supplies, identified by the local schools.0-
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded	$500	$500	$500	

Construction materials donated				
Other: _____				
Other: _____				
TOTALS	$2,250	$4,000	$4,500	

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

Please note: we operate in South Africa and Namibia, and the figures below, is for the whole operation

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 4 2016: 9 2017: 5	2015: 2016: 2017:	2015: 2 2016: 9 2017: 9	2015: 126 2016: 110 2017: 141
Percentage of U.S. clients	2015: 99 2016: 98 2017: 100	2015: 2016: 2017:	2015: 100 2016: 98 2017: 99	2015: 95 2016: 96 2017: 97
Trophy fees paid by U.S. clients	2015: 220000 2016: 495000 2017: 275000	2015: 2016: 2017:	2015: 42000 2016: 225000 2017: 256000	2015: 303 715 2016: 1075 000 2017: 997 375

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: _95%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

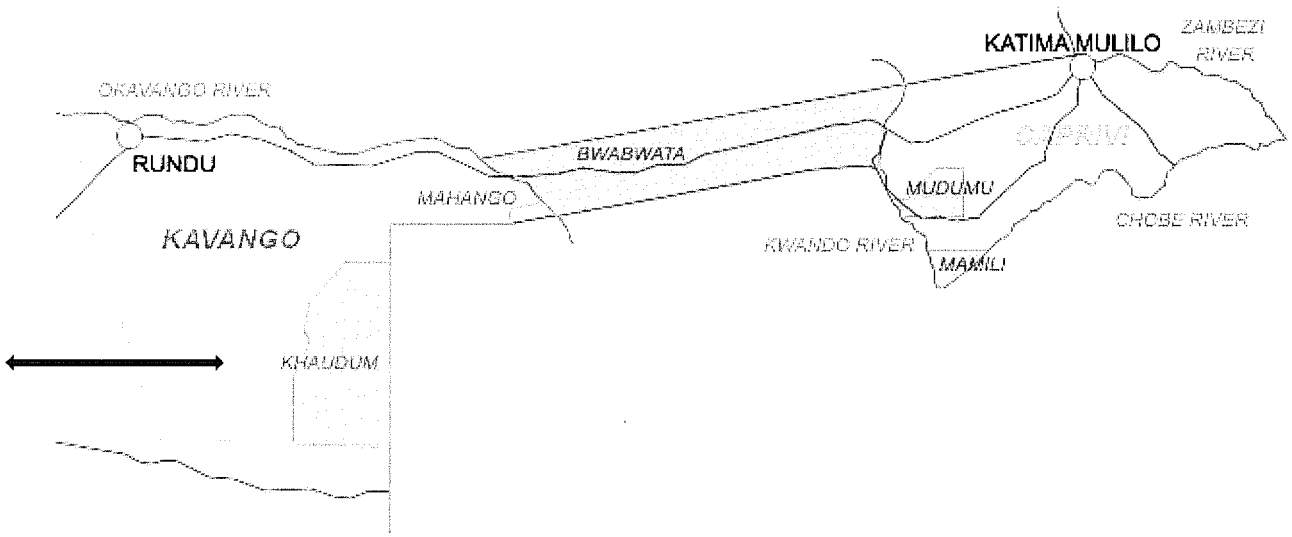
Thormahlen & Cochran operates on other conservancies in Namibia, namely:
Na#Jaqna
Ondjou
Kabulabula
We built camps in Na Jaqna, Ondjou, and Kabulabula. Thormahlen & Cochran donate all the camps to the Conservancies. We deliver all the meat that we hunt, to the conservancies, and donate to every local school the blue bags. We are building roads, and are responsible for the water and electricity supply for the camps. We employ the local community as staff and currently employ 5 to 6 conservancy members as staff . We are also responsible for the training of the staff to be able to serve the overseas clients. To date we have 32 community members employed in the various camps. We also have social responsibilities towards the conservancies: we built a school hostel, a community hall, drilling of waterholes, making cutlines, building roads etc. We are buying protective clothing to the game guards and uniforms for the personnel on an annual basis and opened another drilling hole for N$460,000.

14. I declare that the foregoing is true and correct.

Signature:

Name: _FPJ Thormahlen Title: Mr

Attachment: 1:



ANGOLA
C45/M110
D3600
Rundu
Okavango River
Popa Falls
Divundu
Mahango Game Reserve
Khaudum Game Reserve
Mangetti National Park
B8
B1
Tsumeb
C42
Grootfontein
Otavi
C44/M74
Nyae Nyae Communal Conservancy
D3303
Tsumkwe
Naye Naye Pans
M113/C44
C42
BOTSWANA

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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PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

June 25, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-MAIL: amy_brisendine@fws.gov

RE: PRT # 98648C, Applicant Bobby Lynch, elephant Namibia
Supplement to Existing Application

Ms. Brisendine:

This is a supplement to the existing application, PRT #98648C, for Bobby Lynch for his elephant trophy from Namibia

Answers to Question 9 of the import permit application:

9a. Do you have any information regarding the population status or trend data on the species hunted?

Please reference the National Elephant Management Plan for Namibia that we have included.

9b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Trophy fees for this hunt were around $80,000. The hunt area is part of a Community Concession in a National Park, the operator works with MET and the government for all conservation efforts and community efforts on the land. Trophy hunting brings in income to pay for game guards and anti-poaching activities and meat harvesting and distribution provides a valuable dietary supplement to the community members.

9c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please reference the attached Operator Enhancement Report for Mahango National Park

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. Bobby Lynch w/attachments

Enclosures:
a. Operator Enhancement Report- Mahango NP
b. National Elephant Management Plan for Namibia

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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† DON LINDSAY
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PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

June 25, 2018

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

Re: Application for Permits to Import Sport-Hunted Trophies

Dear Chief Cogliano:

Enclosed please find three import permit applications. The first is for a permit to import a sport-hunted elephant trophy from the Mahango Game Park concession in Namibia. The Mahango area is part of the Zambezi Region of Namibia, and holds the country's largest elephant population, which is increasing. (See enclosed AfESG Status Report.) This operator, Thormahlen & Cochran, has been in business almost two decades and has carefully stewarded this concession. We will be submitted a report from this operator by separate cover. Please consider this information, as well as information in the DMA's files and submitted by Conservation Force and Namibia's Ministry of Environment and Tourism, in making a positive enhancement finding for this applicant.

The second applicant, who has two separate application forms, is hunting lion, elephant, and leopard on Sango Ranch in the Save Valley Conservancy in Zimbabwe. Conservation Force and Zimbabwe's Parks and Wildlife Management Authority have submitted extensive documentation about the healthy elephant and lion population in SVC and the benefits generated by regulated hunting. Please refer to that information, including the October 2016 Non-Detriment Finding and January 2016 report, describing the SVC's strong wildlife management. Please also see the attached declaration from Wilfried Pabst. This declaration was not ultimately submitted in court, but it remains a sworn statement that reflects the healthy wildlife populations in SVC. Please consider all this information in making positive enhancement findings and non-detriment findings for this applicant.

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

Sincerely,

Regina Lennox

Encl:
- AfESG Status Report (2016), excerpts for Namibia and Zimbabwe
- Willy Pabst, Owner of Sango Ranch, Declaration

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

RCVD JUL 3 2018

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Noble	Samuel	Edward	JR

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Scottsboro	Alabama	35769	Jackson	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the ertify that the information submitted in this application for a permit is complete and se statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

6/13/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

Samuel Noble, JR
(b) (6) [redacted]
Scottsboro, AL 35769

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

Conservation Force, 504-837-1233, cf@conservationforce.org

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

(1) Loxodonta Africana Elephant
(1) Panthera leo Melanochaita Lion

b. Sex (if known). male + male

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

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

Sango Ranch, Save Valley Zimbabwe - Masvingo

b. Date wildlife is to be hunted:

June 22 - July 11 2018

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

Zambezi hunters

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

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

b. Date wildlife was hunted:

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

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

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

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

Name: Winston Taylor
Business Name: Zambezi Hunters
Address: P.O Box BW 1330 Borrowdale
City: Harare
State/Province: Zimbabwe
Country, Postal Code:
– Tel: 263.4.882223

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

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signatu (b) (6) _____ Date: 6/13/2018

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

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

African Elephant Status Report 2016

An update from the African Elephant Database

C.R. Thouless, H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché

Occasional Paper of the IUCN Species Survival Commission No. 60

SSC Species Survival Commission

AFRICAN ELEPHANT SPECIALIST GROUP

Zimbabwe's annual declared export quota of elephant trophies remains unchanged since 2007 at 1,000 (tusks as hunting trophies from 500 animals) (CITES, n.d.-b). In 2015, the US Fish and Wildlife Service removed its 'non-detriment' finding, thus banning the import of elephant trophies into the USA (USFWS, 2015a).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Zimbabwe is 82,630 ± 8,589 at the time of the last survey for each area. There may be an additional 1,635 to 1,805 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 78,839 km², which is 97% of the estimated known and possible elephant range. There remains an additional 3% of the estimated range for which no elephant population estimates are available.

There has been a decline of just over 10,000 elephants from surveyed populations since the AESR 2007 and an increase of about 1,000 in guesses, mostly from previously unsurveyed areas in North West Matabeleland. Although there have been large losses from the Sebungwe and Lower Zambezi populations, these have been partially compensated by increases in Gonarezhou and North West Matabeland.

The major populations of the Lower Zambezi Valley (including Mana Pools National Park), Sebungwe (including Matusadona and Chizarira National Parks), North-west Matabeleland (including Hwange and Zambezi National Parks) and the south-east Lowveld (including Gonarezhou NP) were surveyed in 2014 using **aerial sample counts** (including block counts in hilly areas) as part of the Great Elephant Census.

The estimate from the Lower Zambezi Valley in 2014 was 11,656 ± 2,259 (Dunham et al., 2015c). The previous comparable estimate was 19,297 ± 2,527 in 2001 (Mackie, 2002). The 2014 figure replaces an estimate from the AESR 2007 of 19,981 ± 2,392 from 2003 (Dunham, 2004). This survey was less comparable than the 2001 one because it covered a slightly smaller area. There was an approximately 40% decline in the 13 years between 2001 and 2014. The observed carcass ratio of 6% is not as high as one would expect given the rate of population reduction and might suggest that the level of poaching has reduced in recent years. The corridor between the Mavuradonha Wilderness Area and the rest of the Zambezi Valley range has been changed to **possible range** (Packenham quoting Varden, pers. comm., 2016).

The 2014 estimate for Sebungwe was 3,407 ± 1,215 (Dunham et al., 2015b) which replaces an estimate of 15,024 ± 2,133 from a 2006 survey (Dunham et al., 2006a). The observed carcass ratio of 30% indicates an unsustainably high offtake of elephants. There were almost no elephants left in the communal areas, with the main surviving sub-populations in Matusadona and Chizarira National Parks and the Chirisa Safari Area. Wildlife scouts reported 70-100 elephants in Kavira Forest Land at the western end of Sebungwe (M. Sebele pers. comm. in Dunham et al., 2015b).

The 2014 estimate for North-west Matabeleland was 53,991 ± 7,711 (Dunham et al., 2015a), which replaces an estimate of 49,310 ± 7,051 from 2001 (Dunham & Mackie, 2002). There was no significant difference between the totals although the increased carcass ratio of 7% from 3% in 2001 is a worrying sign. Other aerial sample counts were carried out in 2006 and 2007 but they were not

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 Bubye Valley (Leathem & English pers. comm. in Dunham, 2015), and 100 on Bubiana Conservancy (Drummond pers. comm. in Dunham, 2015) in the south of Zimbabwe, replacing guesses of 53 and 50 respectively (Dunham & Mackie, 2002). An old estimate of ten elephants in the Mambali Communal Lands on the Botswana border has been retained from the AESR 2007 (Dunham & Mackie, 2002). A report of 54 elephants on Nuanetsi Ranch is recorded as a **new population**.

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB	YEAR	ESTIMATE	± 95% CI			(km²)	LON	LAT
Chegutu Safari Area	NG	O	E	2014	150		Dunham, 2015	2	445	29.6°E	17.9°S
Greater Mapungubwe											
Tuli, Maramani, Sentinel, Nottingham	RS	AT	A	2014	212		Seier & Page, 2015	2	1,192	29.4°E	22.0°S
Lower Zambezi Valley											
Chewore II	RS	AS	B	2014	594	333	Dunham et al., 2015c	2	1,058	29.9°E	16.1°S
Chewore I & III	RS	AS	B	2014	2,709	851	Dunham et al., 2015c	2	1,773	29.9°E	16.1°S
Chewore IV	RS	AS	B	2014	0		Dunham et al., 2015c	3	472	29.9°E	16.1°S
Doma Safari Area	RS	AS	B	2014	153	194	Dunham et al., 2015c	2	991	29.9°E	16.1°S
Mavuradonha Wilderness Area	RS	AS	B	2014	0		Dunham et al., 2015c	2	652	29.9°E	16.1 S
Mukwiche Area	RS	AS	B	2014	0		Dunham et al., 2015c	3	337	29.9°E	16.1 S
Protea Farm	-	O	E	2001	7		Dunham & Mackie, 2002	4	14	29.6°E	16.5°S
Rest of Zambezi valley	RS	AS	B	2014	8,200	2,029	Dunham et al., 2015c	1	11,720	29.9°E	16.1 S
Mambali Communal Lands	-	AT	E	2001	10		Dunham & Mackie, 2002	2	327	28.4°E	21.5°S
Mangwe Dam	DA	O	D	2014	20	40*	Dunham, 2015	3	291	28.1°E	20.7°S
Northwest Matabeleland											
Fuller Forest Land	NP	O	D	2014	308		Dunham, 2015	3		25.9°E	18.1°S
Gwaai, Bembesi, and Umguza Forest Lands	NP	O	D	2014	165		Dunham, 2015	2	1,442	28.0°E	19.3°S
Gwampa/Lake Alice Forest Lands	NP	O	E	2014	150		Dunham, 2015	2	860	28.5°E	19.1°S
Hwange National Park	RS	AS	B	2014	45,846	6,244	Dunham et al., 2015a	1	15,168	26.4°E	18.8°S
Matabeleland Communal areas	RS	AS	B	2014	2,201	3,062	Dunham et al., 2015a	2	3,075	26.4°E	18.8°S
Matetsi Safari Complex	RS	AS	B	2014	4,843	2,968	Dunham et al., 2015a	1	4,384	26.4°E	18.8°S
Nakavango	NP	O	E	2014	36		Dunham, 2015	3		25.8°E	18.0°S
Ngamo & Sikumi Forest Areas	RS	AS	B	2014	1,101	993	Dunham et al., 2015a	2	2,332	26.4°E	18.8°S
Nyatana Wildlife Management Area	NG	O	E	2014	30		Dunham, 2015	2	651	32.5°E	16.7°S
Sebungwe											
Binga Communal Lands	RS	AS	B	2014	86	162	Dunham et al., 2015b	2	2,201	28.2°E	17.4°S
Chete Safari Area	RS	AS	B	2014	278	222	Dunham et al., 2015b	2	1,242	28.2°E	17.4°S
Chirisa Safari Area	RS	AS	B	2014	1,200	755	Dunham et al., 2015b	2	1,530	28.2°E	17.4°S
Chizarira National Park	RS	AS	B	2014	747	767	Dunham et al., 2015b	2	2,096	28.2°E	17.4°S
Kariba Communal Areas	RS	AS	B	2014	411	364	Dunham et al., 2015b	2	3,198	28.2°E	17.4°S
Kavira Forest Land	NG	O	E	2014	70	30*	Dunham et al., 2015b	2	287	27.0°E	18.1°S
Lusulu	RS	AS	B	2014	0		Dunham et al., 2015b	2	537	28.2°E	17.4°S

Zimbabwe

0 50 100 150 200 250 300km

ABBREVIATIONS AND ACRONYMS

See Appendix 1 for map abbreviations and acronyms

AfESG

2016 African Elephant Specialist Group

Int'l Boundaries
Rivers & Lakes
Towns
Protected Areas
Input Zones

ELEPHANT RANGE
Known
Possible
Doubtful
Sighting

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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Shane Mahoney
Renee Snider

August 27, 2019

RCVD SEP 10 2019

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

RE: PRT No. MA98649C/ MA09644C / MA09883C
African Elephant Trophy/ Zimbabwe/ Sam Noble Jr.

Dear Chief Cogliano:

Please be advised that we would like to that for the following PRT numbers, we would like to add the following information as supplement to our existing application:

PRT No. MA98649C (July 2018, Sango, Savé Valley)
MA09644C (2016, Sango, Savé Valley)
MA09883C (2016, Masvingo) closed

For Question 8 on the application, name of oversees person/ business shipping the trophy, we would like to change this from, Zambezi Hunters to TCI. Please see the complete address below. This is also where the trophy is being stored.

The current location of the Trophy: Trophy Consultants International, 4 Josiah Chinamano Road, Belmont, Bulawayo, Zimbabwe.

Please also can you confirm for the applications for 2016, PRT No. MA09644C is for the elephant harvested in Savé Valley and PRT No. MA09883C is for the elephant harvested in Masvingo. If this is reversed, can you please let us know via email at permits@conservationforce.org.

Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

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† BART O'GARA, PH.D.
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August 27, 2019

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Please do not hesitate to contact us if you have questions about these permit applications.

Sincerely,

John J. Jackson III

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] Re: Elephant Withdrawal Inquiry

1 message

samuel noble [redacted] > Wed, Oct 2, 2019 at 11:18 AM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>
Cc: permits@conservationforce.com

Yes. Successful. Sango Ranch. Save Valley Near chiredzi Zimbabwe. He was taken on July 4 2018.

Sent from my iPhone

On Oct 2, 2019, at 9:59 AM, MacDonald, Tim <tim_macdonald@fws.gov> wrote:

U.S. Fish and Wildlife Service Prt # **98649C**

On 07/03/2018 an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 98649C** . At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and fees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Wed, Oct 2, 2019 at 10:59 AM
To: permits@conservationforce.com, (b) (6)

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Thank you,

Tim Mac Donald

Government Information Specialist
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

[EXTERNAL] Supplement to all outstanding Zimbabwe Elephant Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Tue 6/2/2020 4:57 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (1 MB)

SupplementalLettertoUSFWS.zimbabweElephants.docx; CampfireConcernonImportBans.pdf;

Mr. Brisendine,

Please see the attached letter and document to be included with all applicants listed, which should be all outstanding elephant import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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SHANE MAHONEY
RENEE SNIDER

June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Elephant** import permit applications for applicants listed below – all in Zimbabwe

Atlas Cheek, III	33591C
Michael Condon	53018D
Daniel Crippen	58155C
David Crippen	57769C
Joe Easter	06118C
Brent Goyen	05190C
Arlene Hanson	03369C
John Johnson	53722D
Jonathan Jones	14862D
Donald Moritz	70854D
Jeffery Nicholas	10635C
Sam Noble	09883C
Sam Noble, Jr.	988649C
Sam Noble Jr.	09644C
Bryan Ottmers	85343C
Steve Reeves	84788C
Anthony Rogers	18507C
Stephen Shell	No PRT # (would like to get #)
Thomas Whaley Jr.	04847C
Todd Williams	76700D

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for elephants in Zimbabwe that further detail the elephant populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the

value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

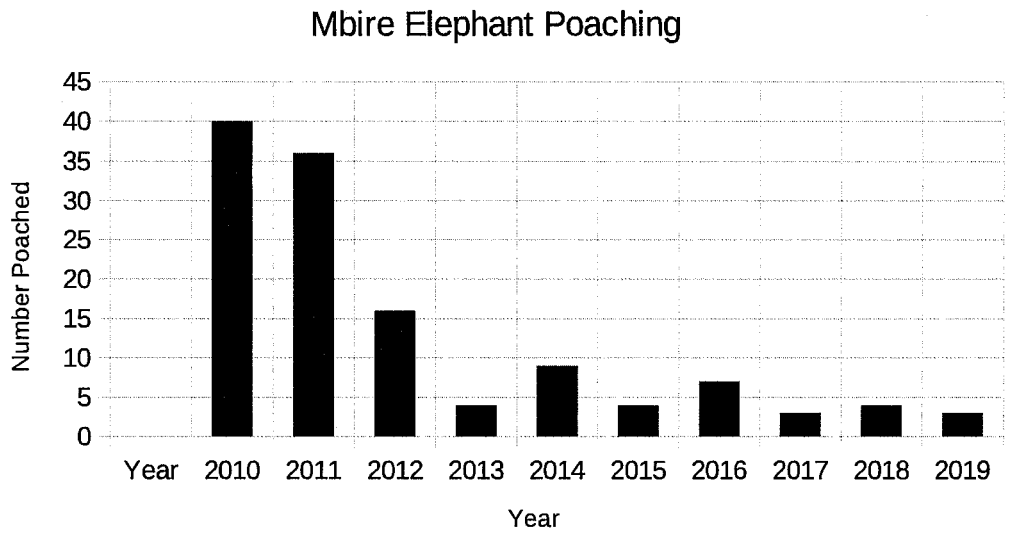

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

CAMPFIRE Association

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

Form 3-200-20

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

RCVD JUL 06 2018

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

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Bock	Brian	K	

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

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

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Black Hawk	South Dakota	57718	Meade	USA

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

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted] 06/24/2018

Signature of applicant or officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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

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

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

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

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

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

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

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

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

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

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

Brian Bock
(b) (6) [redacted]

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

☒ No ☐ Yes

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

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

African Bush Elephant L. Africana Loxodonta

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:

Country-Zimbabwe Management Area-Sijarira Forest City-Bulawayo

b. Date wildlife was hunted:

October 15, 2014

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

Outfitter- Jimba Safaris
PH- Tim Lamprecht
PH Number- 192

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]:

Matabeland Taxidermist
16 Birmingham 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). Sijarira hunting permit # 209 Trass-2074858

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:	Metabeland Taxidermist
Business Name:	16 Birmingham Road
Address:	Belmont Bulawayo Zimbabwe
City:	
State/Province:	This is the company that is handling/holding my trophy but until permit is issued the name of the shipper is unknown.
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?

Not as of yet.

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 to hunt went to pay Salaries, Anti-pouching, Camp supplies and employee uniforms

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 the operator confirms funds spent benefitted the are by providing jobs and a much needed food source for the locals.

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 signatu(b) (6) Date: 06/24/2018

    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).

LB

Form 3-200-20

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

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Kunz	Thomas	James	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number
(b) (6) [redacted]	

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

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Cascade	WI	53011	Sheboygan	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001

(b) (6) [redacted]

copied or stamped signatures) Date of signature (mm/dd/yyyy)

JUNE 22 2018

lease continue to next page

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

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

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

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

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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)?

Thomas Kunz (b) (6) [redacted]

OMB Control No. 1018-0093
Expires 08/31/2020

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

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 Railway 35 in Hwange District Mat North Province s18*49.369 e027*07030 Sep 23 2015

b. Date wildlife was hunted:

September 23 2015

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Wayne Van Den Bergh PH License 369 Nyamazana 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 Contact Paula

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
Business Name: TROPHY CONSULTANTS INTERNATIONAL
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?

Yes I did meet with the game warden in Hwange park He told me the problem is poaching not hunting

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?

Trophy Fees 10,000.00 parks and wildlife Management Authority and land owner

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

Has multiple water holes on farm 35 four the wildlife Burns the grass to bring in lush new green grass

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client s behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature _____ Date _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature (b) (6) _____ Date 06/14/2018

Be aware that there may be a[redacted]ng 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)

Fwd:

(b) (6)

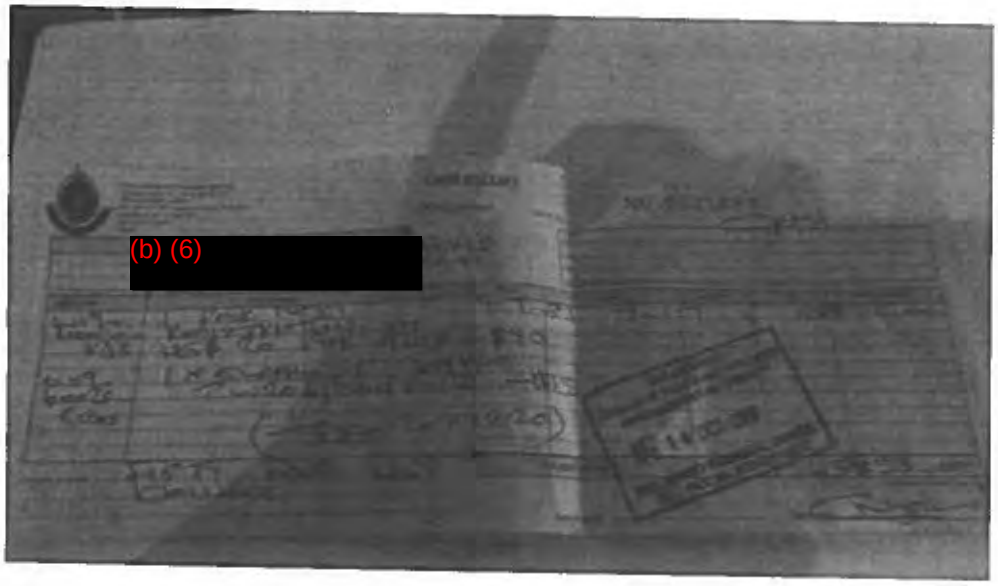
Sun 6/10/2018 12:55 PM

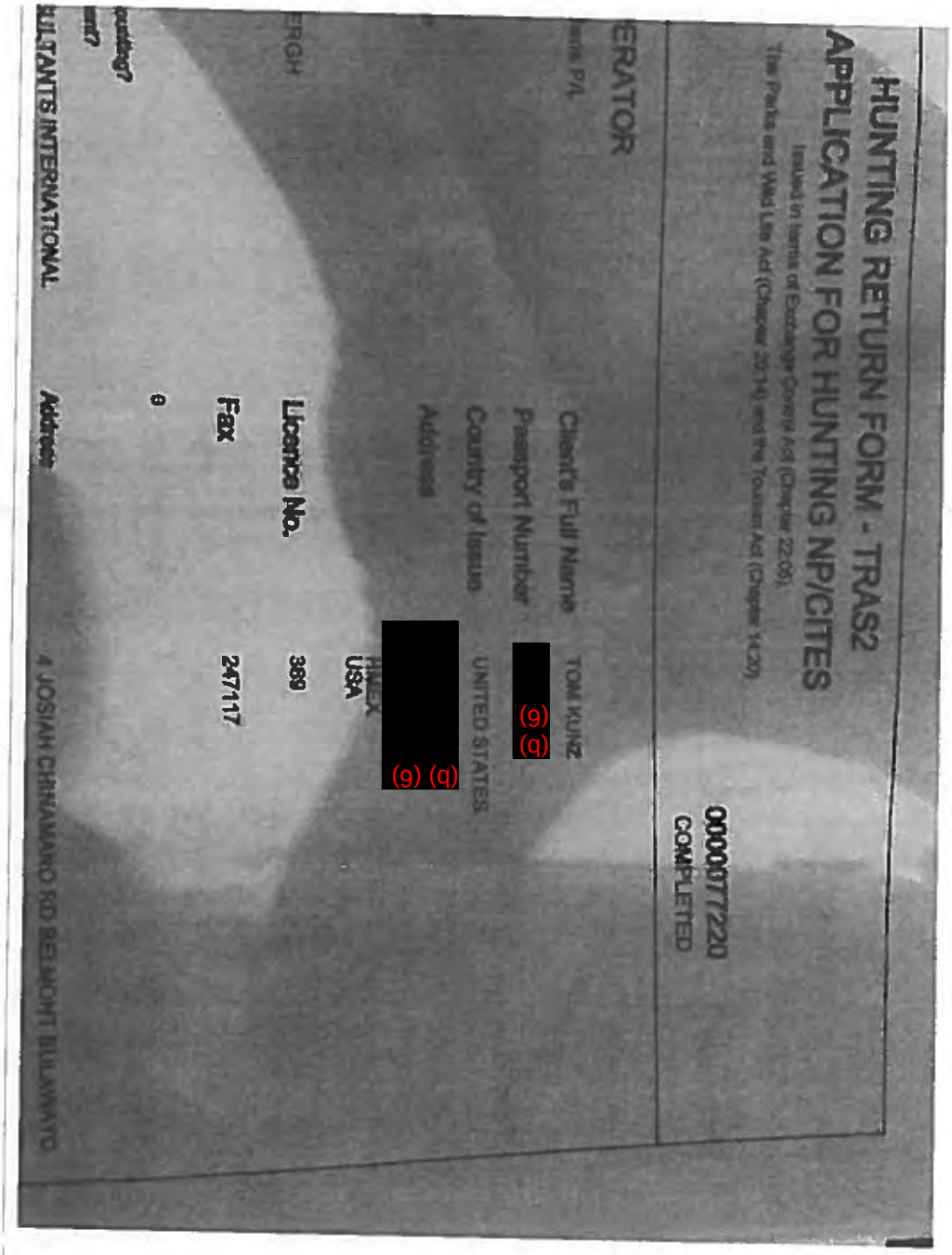
To: Heron Bay Store Manager <heronbaymgr@marketplace.ca>

Sent from my iPad

Begin forwarded message

From: Privac(b) (6)
Date: June 10, 2018 at 12:53:19 PM ADT
To: privacy@gmail.com





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)

0000877220
COMPLETED

ERATOR

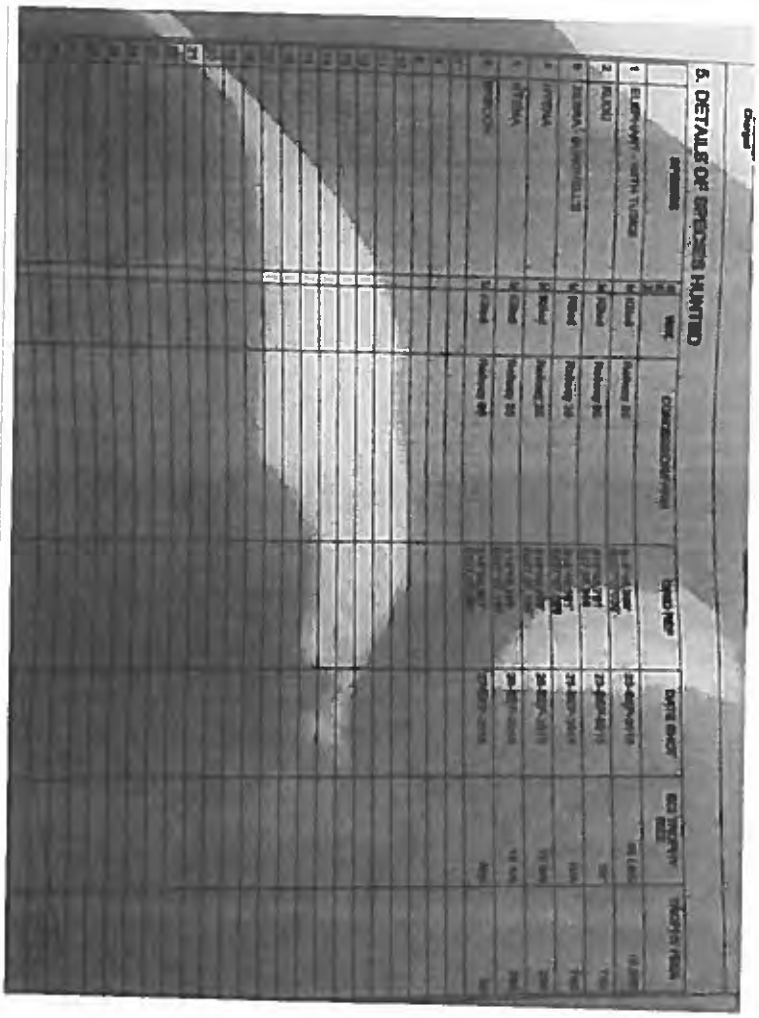
Client's Full Name TOM KUNZ
Passport Number (9) (q)
Country of Issue UNITED STATES
Address
HINDEX USA
(9) (q)

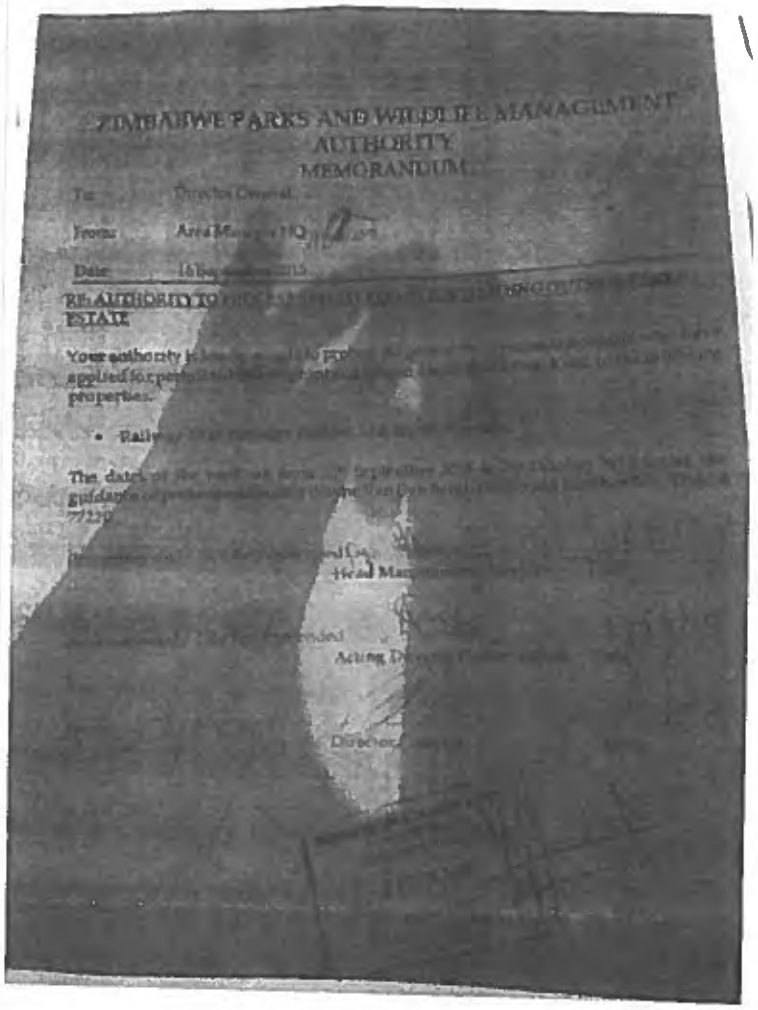
Licence No. 369
Fax 247117
0

4 JOSIAH CHINAMANO RD BELMONT BULAWAYO

ERGH
ending?
ent?
SULTANTS INTERNATIONAL

Sent from my iPad





ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 16th [illegible] 2013

RE: AUTHORITY TO [illegible] ESTATE

Your authority is [illegible] applied for permission [illegible] properties.

- Railway [illegible]

The date of the [illegible] guidance [illegible] 77220

Head Ma[illegible]

Acting D[illegible]

Director [illegible]

Sent from my iPad

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

AUG 1 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
OWENS	JEFFREY	M	MR

(b) (6) [redacted]

Section B: Complete if applying as a business, agency, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
HAPPY VALLEY	OR	97086	Clackamas	USA
2 (b) (6) [redacted]				
2 Clackamas	OR	97015	Clackamas	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 applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) [redacted] 7/14/2018

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) as on Page 1

(b) (6) Clackamas OR 97015

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Jeff Owens (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 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:
   South Africa

   b. Date wildlife is to be hunted:
   Starting June 2, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   Quagga 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:
   South Africa, Limpopo Province, Maseke Game Reserve / Balule (Arctic 156kt, Square 150kt Morelag SKV, TR4 155KTT Parsons 155kt, Mopani Di Marueng, Limpopo

   b. Date wildlife was hunted:
   June 1 to June 10 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

MR. SOREN Burkal Nielsen + Quagga Safari's

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 Solutions Africa
11 Sixth Ave
Polokwane 0699 South Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Enclosed

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Trophy Solutions Africa
Address: 11 Sixth Ave
City: Polokwane 0699
State/Province:
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?

8 permitts are issued in 2018 in this Conservatory Next to Kruger National Park fences where removed a few years due to Overpopulation in the Park

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 Trophy fee + license fee was $57.000 This is critical to Conservation, Anti poaching in the area the 8 permits will total more Dollars for the Park than the tourist will Bring collectively. Esential 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

All of the meat was taken (I witnessed) it is donated to the local Orphanages as well as the Hospital. A total of Approx 2500 lbs. to the local Village

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: 7/14/2018

    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).

QUAGGA SAFARIS

P.O. Box 1010
Lephalale
South Africa
0555

Cell : 073 829 1128
E-Mail : Safari@Quagga.CO.ZA

Invitation to Hunt

Hereby we wish to confirm that Jeffrey M Owens

has reserved a legal hunting trip with us for dates :

May 31, 2018 to June 14, 2018

He will be hunting on our properties and his method of hunting is Rifle.

Herewith our outfitter details :

Outfitter Permit	: CPM/3139/2016
Professional Hunter Permit	: 0098-CPM401-01563
Exemption Permit	: CPM-13752
Property	: Farm Richmond, Lephalale, South-Africa

Contact details as above.
Please assist our clients in their fire arm permits/Visas.

F.J Visser
(Owner/Outfitter/PH)

Trophy Care cc T/A
2004/085924/23
TROPHY SOLUTIONS AFRICA
TRUST - CARE - PERFECTION

Tel: +27-15-880-0888 (Office Hours)
Fax: +27-12-349-8388
Cell: +27-82-820-1234 (Johan)
info@trophy-care.com
contact@trophy-care.com
www.trophy-care.com

PO Box 12043
Bendor Park 0713
Polokwane, SOUTH AFRICA
Customs Code 20302458
State Vet Registration Code ZA 8/117
TOPS Registration Certificate # 05116

CLIENT INFORMATION SHEET

FULL LEGAL NAME:	Jeffrey M Owens
LEGAL Address:	(b) (6)
	Happy Valley Oregon, 97086
Tel Nr. / Fax Nr:	(b) (6)
E-mail Address:	

BROKER / AGENT:	Brownstone International
Contact Person:	Ryan
LEGAL Address:	(b) (6) , Portland Oregon 97230
Tel Nr. / Fax Nr:	(b) (6)
E-mail Address:	

TAXIDERMIST:	
Contact Person:	Brooks Cavanah
LEGAL Address:	(b) (6)
	Molalla Oregon 97038
Tel Nr. / Fax Nr:	(b) (6)
E-mail Address:	

Please **complete** the information requested and
e-mail to **contact@trophy-care.com** or Fax (Direct Dial) to **011-27-12-349-8388**

This will ensure your trophies arrive at the correct destination without delays

Written permission to hunt wild animals and conveyance document
(As required by Nature Conservation Legislation)

Person Granting The Permission:

Name: Mr Soren Burkal Nielsen Tel no: 082 601 4335

Residential address: P O BOX 799 E – mail: snwild@gmail.com

HOEDSPRUIT 1380

Farm name: MASEKE GAME RESERVE / BALULE (ARCHIE 156 KT, SQUARE 150 KT, MORELAG 5 KV, TRY 155 KT & PARSONS 155 KT, MOPANI DISTRICT, MARULENG , LIMPOPO PROVINCE)

Exemption permit number: ..... Expiry Date: .....

Species listed on exemption permit

Person to whom the permission is granted:

Name: JEFFREY MICHAEL OWENS Tel no: (b) (6) Fax no: (b) (6)

Residential address: (b) (6) E – mail: (b) (6)

CLACKAMAS, OR, USA, 97015

Period for wich permission is granted: From 1 JUNE 2015 To 30 JUNE 2015

Date permission is granted:

Signature of person granting permission: Date:

Signature of person to whom permission is granted: (b) (6) Date:

Species of wich permission is granted

SPECIES	QTY	SEX	SPECIES	QTY	SEX

Destination to where the wild animals will be conveyed: JEFFREY SOLUTIONS AFRICA – POLOKWANE

Hunting them is a reflection for the love, pride and passion we have for our African Game!

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

DETAILS OF PERMIT HOLDER

NAME	J M
SURNAME	Quena
ID NO.	—
PASSPORT NO	(b) (6)
POSTAL ADDRESS	
ADDRESS	
ADDRESS	
ADDRESS	
TOWN	
POSTAL CODE	
PROVINCE	

(b) (6)

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	S Nelson
NAME AND SURNAME: RESPONSIBLE PERSON	S Nelson
NAME AND SURNAME OF AGENT	—
PHYSICAL ADDRESS OF FACILITY	Maseke (Baluba)
PHYSICAL ADDRESS OF FACILITY	Kazungula
DISTRICT	Zambia
PROVINCE	Livingstone
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
elephant	L. africana	Male	one	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Hunt elephant in Maseke (Baluba)

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)	J M Quena
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	Kasai
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	Rifle with stock
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	

PERIOD OF VALIDITY	PERMIT VALIDATION FROM	22/05/2018	TO 22/08/2018
RECEIPT NUMBER	E [illegible]		
SIGNATURE OF ISSUING OFFICER	22 MAY 2018	SIGNATURE OF PERMIT HOLDER	
DATE STAMP			

RCVD AUG 1 201

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Ashbrook	Howard	J	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Claysville	PA	15323	Washington	United States

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
Claysville	PA	15323	Washington	United States

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions (50 CFR 13.11(d)).

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other applicable parts in subchapter B of Chapter I of Title 50 and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature of applicant (see instructions for signatures) Date of signature (mm/dd/yyyy) 07/19/2018

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:

- 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.

Howard J. Ashbrook
(b) (6)
Claysville, PA 15323

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Howard J. Ashbrook
(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] 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:

District- VHEMBE, Province - LIMPOPO, Game Farm - SINGELELE NATURE RESERVE, MUSINA 0900 LIMPOPO, South Africa (ZA)

b. Date wildlife was hunted:

May 15, 2017 to May 20, 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Petrus C. Jansen, 1 East Crescent, Musina 0900, Limpopo Province, South Africa

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]:

Moredou Taxidermy, P.O. Box 323, North West Province, Farm Moredou Schweizer-Reneke 2780 South Africa (ZA)

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). [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:	Hilgard Pieter Kotze
Business Name:	Farm Moredou
Address:	P.O. Box 323
City:	Schweizer-Reneke 2780
State/Province:	North West Province
Country, Postal Code:	South Africa (ZA)

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

N/A

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?

$18,500 [all inclusive cost for hunt of elephant]

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: Jul, 19 2018
07/19/2018

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.

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).

PERMIT / CERTIFICATE

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

- [X] EXPORT
- [ ] RE-EXPORT
- [ ] IMPORT
- [ ] OTHER

ORIGINAL

2 Valid until 06/12/2018

3 Importer (name and address)
MR HOWARD ASHBROOK
(b) (6) [redacted]

4. Exporter / Re-exporter (name, address and country)
HILGARD PIETER KOTZE
FARM MOREDOU
SCHWEIZER-RENEKE
NORTH WEST PROVINCE
SOUTH AFRICA (ZA)

3a Country of import U.S.A

5 Special conditions INVALID WITHOUT THE ATTACHED CONDITIONS PAGE 2 OF 2. PERMIT MUST BE ENDORSED AT PORT OF EXIT. ALSO SERVES AS TOPS. WITH ZA172217 7.8 LP & ZA 172218 7.6 LP

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) H

5b. Security stamp No 1370366

	7 a SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	8 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.a ELEPHANT (LOXODONTA AFRICANA)	9. 2X TUSKS ON PEDESTALS	10 II W	11 (02) TWO	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.a ELEPHANT (LOXODONTA AFRICANA)	9 4X FEET	10. II W	11. (04) FOUR	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.a ELEPHANT (LOXODONTA AFRICANA)	9 2X EARS SOFT TANNED	10 II W	11 (01) ONE EACH	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.a ELEPHANT (LOXODONTA AFRICANA)	9. TAIL ON HANDLE	10. II W	11 (01) 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 ***	

* 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: Dasi Diole

MAFIKENG (Place) 07/06/2018 (Date)

CITES MANAGEMENT AUTHORITY SA
NORTH WEST PROVINCE
07 JUN 20
Private Bag X2039 Mmabatho 2735
Tel: +27 (0)18 389 5433 Fax: +27 (0)18 389 5840

14. EXPORT ENDORSEMENT:

Block	Quantity
A	
B	
C	
D	

15 Bill of Lading/Air Waybill Number:

Port of Export / Date / Signature / Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2482 (2821)

PERMIT / CERTIFICATE

CONDITIONS FOR PERMIT NO. 209281

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 animal's 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 lists 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 holder/s or their delegated agent/s 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

CITES MANAGEMENT AUTHORITY SA
NORTH WEST PROVINCE
07 JUN 2018
Private Bag X2039 Mmabatho 2735
Tel: +27 (0)18 389 5331 Fax: +27 (0)18 389 5840

Signature of Recipient

Date

Full Name

Conditions to this permit are subject to the provisions of Convention on International Trade in Endangered Species of wild fauna and flora (CITES) regulation 3(2)(a) & 45(2) of the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004).

Vmu 123/2017

GP:S

ORDINARY PERMIT

PERMIT NUMBER: O **No.** 03051

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	ENVIRONMENTAL AFFAIRS
ADDRESS	MUSINA
	0900
PROVINCE	LIMPOPO

DETAILS OF PERMIT HOLDER

NAME	MR HOWARD JAMES	ID NO.	
SURNAME	ASHBROOK	PASSPORT NO.	(b) (6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS		(b) (6)
ADDRESS		
ADDRESS		
TOWN		
POSTAL CODE		
PROVINCE		USA

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MR PETRUS CORNELUIS JANSEN
NAME AND SURNAME: RESPONSIBLE PERSON	MR P 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)	SINGELELE NATURE RESERVE

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (If applicable)
COMMON NAME	SCIENTIFIC NAME			
ELEPHANT	LOXODONTA AFRICANA	MALE	1 (ONE)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

TO HUNT ONE ELEPHANT BULL DURING THE DAY USING A RIFLE. THE TUSK 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 HOWARD JAMES ASHBROOK
NAME AND SURNAME OF PROFESSIONAL HUNTER (If applicable)	MR PETRUS CORNELUIS JANSEN
NAME AND SURNAME OF HUNTING OUTFITTER (If applicable)	MR PETRUS CORNELUIS 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	13 & 7,6
LENGTH OF THE ELEPHANT IVORY	85,0 & 89,0
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	34,0 & 33,0
REGISTRATION NUMBER	ZA IY 22IY 7,8 NT & ZA IY 22IZ 7,6 LP
MICROCHIP NUMBER	

PERMIT VALIDITY

PERIOD OF VALIDITY	FROM: 15/05/2017 TO: 25/05/2017
RECEIPT NUMBER	109
SIGNATURE OF ISSUING OFFICER:	(b) (6)
DATE STAMP:	

DEPARTMENT OF ENVIRONMENTAL AFFAIRS & TOURISM
AUTHORISED / NOT AUTHORISED
2017 05 15
SIGNATURE.....
WILDLIFE TRADE & REGULATION

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt Commenced 15 / 05 / 2017 Terminated 20 / 05 / 2017

A. LP Nº

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 P. JANSEN

Business Address EAST CRESCENT

MOSSEL

CAPE

ID No 8[illegible]

PH Permit No ZA/LP/8187

Date 20/05/2017 Signature

CLIENT

[redacted] (b) (b)

HUNTING OUTFITTER

Name PC JANSEN

Business Address EAST CRESCENT

MOSSEL

Code 6[illegible]

ID No 5[illegible]

Tel No [illegible] Fax No

HO Permit No 219/LP/7[illegible]

Date [illegible] Signature

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date of Hunt From	Date of Hunt To	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
MARE MARE Sanctuary Pedhuke Kwaggas MTB	MOSSEL	PC JANSEN P.O. BOX 225 MOSSEL	0305[illegible]	15/05/2017	20/05/2017	ELEPHANT	1		✓	2 x TUSKS 2 x EARS 4 x FEET 1 x TAIL 1 x 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

Code

Country Trophy Export Date (Estimate)

079854

REPUBLIC OF SOUTH AFRICA

Department of Agriculture
Directorate Veterinary Services
P/Bag X 138, Pretoria, 0001

08 June 2018

Our Ref: 04/415/18/09
APPENDIX A

CERTIFICATE / DOCUMENT

For treated game trophies of birds and ungulates, being solely bones, horns, hooves, claws, antlers, teeth, hides or skins for dispatch to the ~~European Community /~~ United States of America (USA) ~~/ Canada~~

Note for the importer: *This certificate / document is for veterinary purposes only and must accompany the consignment until it reaches the border inspection post.*

Country of destination: **U.S.A.**
Reference number of the certificate / document: 04/415/18/09

Exporting country: **REPUBLIC OF SOUTH AFRICA**
Competent authority: **NATIONAL DEPARTMENT OF AGRICULTURE**
Certifying authority: **NORTH WEST PROVINCE DEPARTMENT OF AGRICULTURE**
Place of origin: **Môredou Taxidermy, P. O. Box 323, Schweizer-Reneke, 2780, South Africa (ZA)**
Facility approval No.: **ZA 8/25**

1. **Identification of game trophies***

Quantity	Species	Scientific Name	Description
1 (one)	Elephant	*Loxodonta Africana*	2 x Tusks on pedestals, 4 x feet (2 x tables, 2 x stools), 2 x ears soft tanned, tail on handle
1 (one)	Blesbuck	*Damaliscus Pygargus Phillipsi*	Skull/horns bleach
1 (one)	Ostrich	*Struthio Camelus*	Flat skin tanned (Purse, rifle slings, offcuts and feathers
1 (one)	Impala	*Aepyceros Melampus*	Skull/horns bleach and flat skin tanned
1 (one)	Sable	*Hippotragus Niger*	Shoulder mount and back skin tanned
1 (one)	Nyala	*Tragelaphus Angassii*	Shoulder mount and 2x feet (2x Hatracks)

* - Also refer to attached Packing List

Nature of packaging: **WOODEN CASE(S)**
Number of parts or packages: **6 (Six) items**
Reference number of CITES certificate: **209281**

II. **Destination of the game trophies:**

These game trophies will be transported by: Aeroplane (*means of transport*) from: Johannesburg International Airport (*place of loading*) by: Logwin Globistics, P. O. Box 360, Isando, 1600 (*shipping agent*) to:
Mr. Howard Ashbrook, (b) (6) [redacted] **U.S.A.** (*name and address of consignee*).
Identification of transport / seal number (s): **Not available on signing date**

III **Health Attestation by Official Veterinarian**

I, Dr R E Murapa the undersigned official veterinarian responsible for inspection and certification for **Môredou Taxidermy (ZA 8/25)**, certify that the game trophies above:

a) have undergone full processing at an officially approved taxidermy regularly inspected by official veterinary personnel;

b) have been packaged, immediately after treatment, without being in contact with other products of animals origin likely to contaminate them in individual, transparent and closed packages so as to avoid any subsequent contamination;

c) ~~in the case of trophies consisting solely of hide or skin,[1] they have either been:~~

~~salted and dried[1]~~

~~or~~

~~wet-salted for a minimum of 14 days before dispatch~~

~~or~~

~~Dry-salted or wet-salted on the following date ..... and, according to the declaration of the transporter, the hides and skins will be transported by ship and the duration of transported will be such that they will have undergone a minimum of 14 days of salting before they reach the border inspection post.[1]~~

d) in the case of game trophies consisting solely of bone, hooves, claws, antlers or teeth,[1] they have either been:

- have been immersed in boiling water for an appropriate time so as to ensure that any matter other than bone, horns, hooves, claws, antlers or teeth is removed;

or

- have been disinfected with a product authorised by the competent country of dispatch, in particular with hydrogen peroxide where parts consisting of bone are concerned.

Done at **Schweizer State Vet Office** (*place*) on this **8th day of June 2018** (*date*)

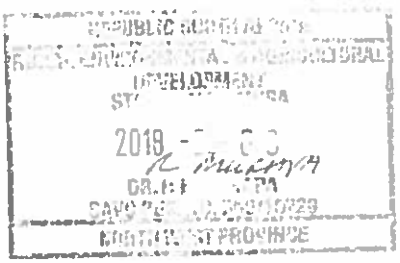
Dr R E MURAPA (BVSc) – State Veterinarian
Name, title and qualification in capital letters

.....
signature of the official[1]

Phone: +27 53 963 1140 Fax: +27 53 963 1399 Email: remurapa@gmail.com

Stamp[3]

[1] Delete as appropriate
[2] Optional
[3] Signature and stamp must be in a colour different to that of the print



Department:
Rural, Environment and Agricultural Development
North West Provincial Government
REPUBLIC OF SOUTH AFRICA

AgriCentre Building
Cnr. Dr. James Moroka and Stadium Rd.
Private Bag X2039
Mmabatho 2735
Republic of South Africa
Tel: +27 (18) 389 5228
Fax: +27(18) 389 5640
Fax2mail:+27(86) 517 9137
E-mail:

CHIEF DIRECTORATE: ENVIRONMENTAL SERVICES

DIRECTORATE: BIODIVERSITY MANAGEMENT

PERMIT HQ 06/06/18- 164 NW

ISSUED IN TERMS OF THE PROVISIONS OF THE TRANSVAAL NATURE CONSERVATION ORDINANCE 12/83, CAPE NATURE CONSERVATION ORDINANCE 19/74 AND THE BOPHUTHATSWANA NATURE CONSERVATION ACT 3 OF 1973.
In terms of and subject to the provisions of the Ordinances and Law and the regulations framed there under, the permit holder is hereby authorized subject to the conditions and requirements appearing on this permit to carry out the activity with the wild animals or plants as mentioned in the permit during the period of validity of this permit.

VALIDITY: FROM 06.06.2018 TO 05.12.2018

1	Description of permitted activity.	**EXPORT OF TROPHIES OUT OF NW PROVINCE / SA**
		APPLICANT
	Particulars of person: ID, Home address & telephone	Moredou Taxidermy
		Farm Moredou Schweizer-Reneke 2780 Tel: 053 963 1444
		SOUTH AFRICA (ZA)
2	Description of permitted activity.	**DESTINATION OF HUNTING TROPHIES**
	Particulars of person: ID, Home address & telephone	Howard Ashbrook Passport #: (b) (6) (b) (6)
	Venue of activity	USA
3	Species	See attached addendum
4	Additional information	This permit is subject to the import regulations from the country of import. This permit is subject to approval from Veterinary Services. This permit must be endorsed at port of exit and/ entry.

CONDITIONS AND REQUIREMENTS.

THE PERMIT IS NOT TRANSFERABLE. ONLY A PERSON AUTHORIZED THERETO MAY MAKE AN ALTERATION ON THIS PERMIT. THIS PERMIT SHALL BE SUBJECT TO THE PROVISIONS OF ANY LAW IN FORCE DURING THE PERIOD OF VALIDITY OF THE PERMIT. THE HOLDER OF THE PERMIT WHO CONTRAVENES OR FAILS TO COMPLY WITH ANY ONE OF THE CONDITIONS OR REQUIREMENTS, TO WHICH THIS PERMIT IS SUBJECT, SHALL BE GUILTY OF AN OFFENCE. THE HOLDER OF THE PERMIT SHALL HAVE THE PERMIT WITH HIM/HER WHEN THE ACTIVITY IS CARRIED OUT

Issued by:
Permit Officer
Conservation Services

NATURE CONSERVATION OFFICE
NORTH
08 JUN 2018
Private Bag
Tel: +27 (0)18 389 5331 Fax: +27 (0)18 381 5640

Authorized by:
Manager Permitting
Conservation Services

ADDENDUM PERMIT HQ 06/06/18- 164 NW

QUANTITY	COMMON NAME	SCIENTIFIC NAME
01	Blesbuck	*Damaliscus pygargus phillipsi*
01	Ostrich	*Struthio camelus*
01	Impala	*Aepyceros melampus*
01	Sable Antelope	*Hippotragus niger niger*
01	Nyala	*Tragelaphus angasii*

Issued by:
Permit Officer
Conservation Services

NATURE CO... ...IT OFFICE
NOR...
06 JUN 2018
Date Stamp
Private ... ...
Tel: +27 (0)13 329 5331 Fax: +27(0)13 329 5640

Authorized by:
Manager Permitting
Conservation Services

WE BELONG WE CARE WE SERVE

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAY 08 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Costa	Lawrence	P	

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. (b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Nottingham	NH	03290	Rockingham	USA
2.a. Mailing Address (include if different than physical address, include name of contact person if applicable) (b) (6)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Nottingham	NH	03290	Rockingham	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.

(b) (6) 4/18/2018

Signature of applicant/ Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Lawrence Costa
(b) (6) [redacted]
Rumford, ME 04276

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
(b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

NA

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   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 Kalambezo, Zambezi Region Namibia
Prof 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 Republic of Namibia
+264 (0)61 304030

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:
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?

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 trop

Applicant's signature: _____ (b) (6) _____ 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 / [redacted]
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	
		TOTAL	$ 8,775

OTHER COMMENTS

1. Total payment due in 30 days

Banking Details:

VAT no.: 2695338-01-5

Thank You For Your Business

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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.:	174477
VALID FROM:	31.08.17
VALID TO:	18.09.17

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: L.P Custer

Residential Address:

Country: USA

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
	Buffalo	2x
CITES II	Crocodile, Nile	2x
	Dik-dik	
	Eland	
CITES II	Elephant	2x
	Giraffe	
	Grey Duiker	2x
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	2x
	Klipspringer	
	Kudu	1x
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	2x
	Warthog	2x
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
	*Report back within 48hrs after har	

on the following farms / hunting concessions: Brt. Bruta, Ecist

Guided by (name of guides): K. Stumpf, N. Nel & F. Bezuidenhout

Cashier receipt No.: 2148355

Issued on

Amount received: N$

MINISTRY OF ENVIRONMENT & TOURISM
R Hebes. R Hebes
ISSUING OFFICER (NAME & SIGNATURE)

Official MET date stamp

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 Name	Farm No	Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
7/9/17	Buffalo	93		27	27	147		6yr	M	Bwabwata East		K. Stemple	(b) (6)	
7/9/17	Croc									Bwabwata East		K. Stemple		
8/9/17	Impala	57	55	12	12	136		3yr	M	Bwabwata East		K. Stemple		
9/9/17	Kudu	126	127	27	27	308		5yr	M	Bwabwata East		K. Stemple		
7/9/17	Elephant									Bwabwata East		K. Stemple		
			Elephant GPS coordinates:								S 17° 41.998'			
											E 023° 22.041'			

174477
08.17
9.17

wland Ward
J by a professional hunter,. master hunting guide or hunting guide
ermit holder at all times while hunting.
nduct the hunt.

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
A 08181	E Tusk	111	131	43	29	63	9Kg	
	E.Tusk	106	127	35	31	60	9Kg	
	Skin Panel		x6					
	Tail x 1							
	Ear x 2							
	Trunk x1							
	feet x 4							
	Skull x1							
	Buffalo							
	Skull x horns		x1					
	full Skin x 1							
	Crocodile							
	full Skin x1							
	Impala							
	Skull x horns		x1					
	full Skin x1							

Windhoek Printers-92-12868

Barry, Anna <anna_barry@fws.gov>

Lawrence P. Costa PRT #89879C

1 message

Barry, Anna <anna_barry@fws.gov> Fri, Nov 16, 2018 at 2:33 PM
(b) (6)

Dear Ms. Mary Arsenault,

The following is in response to your request regarding the status of the application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by-application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African elephant and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

Lawrence P. Costa PRT #89879C

3 messages

Barry, Anna <anna_barry@fws.gov> Fri, Nov 16, 2018 at 2:33 PM
(b) (6)

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Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Microsoft Outlook <postmaster@doi.gov> Fri, Nov 16, 2018 at 2:34 PM
To: anna_barry@fws.gov

Delivery has failed to these recipients or groups:

(b) (6)

A problem occurred and this message couldn't be delivered. Check to be sure the e-mail address is correct. If the problem continues, please contact your helpdesk.

Diagnostic information for administrators:

Generating server: smtp6.doi.gov

(b) (6) [redacted]
#554 5.4.4 SMTPSEND.DNS.NonExistentDomain; nonexistent domain ##

Original message headers:

```
Received: from smtp7.smgr.doi.gov (10.10.28.13) by smtp6.doi.gov (10.10.28.22)
 with Microsoft SMTP Server id 14.3.408.0; Fri, 16 Nov 2018 14:34:26 -0500
DKIM-Signature: v=1; a=rsa-sha256; d=fws.gov; s=mail; c=relaxed/simple;
        q=dns/txt; i=@fws.gov; t=1542396868;
        h=From:Sender:Reply-To:Subject:Date:Message-ID:To:Cc:MIME-Version:Content-Type:
        Content-Transfer-Encoding:Content-ID:Content-Description:Resent-Date:Resent-From:
        Resent-Sender:Resent-To:Resent-Cc:Resent-Message-ID:In-Reply-To:References:List-Id:
        List-Help:List-Unsubscribe:List-Subscribe:List-Post:List-Owner:List-Archive;
        bh=QFr10mswVSnErldECB5KDZ29iG4JiXJeOd2+WqlP4A0=;
        b=igzstO8Ov5Hc1bH/hH0kTVkJr9EdGojgXfaeTwUGPHI4fW0rCvYgOJzchsb/3ZlY
        J/UKkiAlb5khJyrxOudMfvcDDR3Ilys61T7l/Xo8OAUQ0pRr1rWAy/UghQTT4+KY
        mi+lHsxZqNUqRP8/o+gOzdR0OBBQY+kBAtHLevkDyhs=;
X-AuditID: 0a0a1c0d-30fff7000000196a-f2-5bef1bc4f9b9
Received: from gsmtp6.doi.gov ( [10.10.28.16])  (using TLS with cipher
 ECDHE-RSA-AES256-SHA (256/256 bits))  (Client did not present a certificate)
        by smtp7.smgr.doi.gov (Hello) with SMTP id D4.EE.06506.4CB1FEB5; Fri, 16 Nov
 2018 14:34:28 -0500 (EST)
Received: from mail-qk1-f200.google.com (209.85.222.200) by gsmtp6.doi.gov
 (137.227.28.16) with Microsoft SMTP Server (TLS) id 14.3.408.0; Fri, 16 Nov
 2018 14:34:24 -0500
Received: by mail-qk1-f200.google.com with SMTP id c84so54009563qkb.13
        for [redacted]; Fri, 16 Nov 2018 11:34:27 -0800
 (PST)
X-Google-DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
        d=1e100.net; s=20161025;
        h=x-gm-message-state:mime-version:from:date:message-id:subject:to;
        bh=L0GhU7qypCwGfpmdbiMrzkgWJaO52R9tZRrLdmEsDJQ=;
        b=FAPvJCpr7mx7qYvNMxyjtJc+cGmkz+y+qSRk89ASogDL4fsUjaWYDDXQi8WTBBejx3
         Zdogh/oP2leyelXmDarjfwepNUCEOkFZLl2wDowDW8fh2ksX8bIsC4qfiXQmtvRyeElI
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X-Received: by 2002:aed:3c7d:: with SMTP id u58mr11951564qte.198.1542396867052;
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 Fri, 16 Nov 2018 11:34:26 -0800 (PST)
MIME-Version: 1.0
From: "Barry, Anna" <anna_barry@fws.gov>
Date: Fri, 16 Nov 2018 14:33:50 -0500
Message-ID: <CAMEp378FgNbDPra=_HQg3pdFHWbJD-yueek3Zwp6ec0sAaE++w@mail.gmail.com>
(b) (6) [redacted] boundary="00000000000057d81e057acd418b"
X-Gm-Spam: 0
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Return-Path: anna_barry@fws.gov
X-CFilter-Loop: Reflected
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```

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Final-(b) (6)
Action: failed
Status: 5.4.4
Diagnostic-Code: smtp;554 5.4.4 SMTPSEND.DNS.NonExistentDomain; nonexistent domain

---------- Forwarded message ----------
From: "Barry, Anna" <anna_barry@fws.gov>
To: (b) (6)
Cc:
Bcc:
Date: Fri, 16 Nov 2018 14:33:50 -0500
Subject: Lawrence P. Costa PRT #89879C
Dear Ms. Mary Arsenault,

The following is in response to your request regarding the status of the application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by-application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African elephant and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov> Fri, Nov 16, 2018 at 2:37 PM
To: L(b) (6) t

---------- Forwarded message ---------

From: **Barry, Anna** <anna_barry@fws.gov>
Date: Fri, Nov 16, 2018 at 2:33 PM
Subject: Lawrence P. Costa PRT #89879C
To: (b) (6)

[Quoted text hidden]

BRANCH OF PERMITS, MS: IA

Please mail all original issued permits to:

HUNTER INT'L BROKERAGE SERVICES
5674 Stoneridge Drive, Suite 209
Pleasanton, CA 94588
Tel: (925) 417 5270 Fax: (925) 417 0170

RCVD MAR 16 2017

OMB No. 1018-0164
Expires 11/30/2016

Fe orm

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Kiyosaki	Robert	T	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			
(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	1.b. Doing business as (dba)		
n/a			
2. Tax identification no	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Phoenix	AZ	85016		

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
-same-

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue. _____ No ☑

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

[signature] Atty. In Fact for Robert T. Kiyosaki — 03/10/2017

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:_____(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:

   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: Mawana Game Reserve, South Africa

   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):

   Tusks, Trunk, Skin panels 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]:

   Spirit of Africa Taxidermy
   PO Box 1611/37 Ogilvie Rd, Howick, 3290 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:	Spirit of Africa Taxidermy
Address:	PO Box 1611
City:	37 Ogilvie Road
State/Province:	Howick, 3290
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: Atty. In Fact for Robert Kiyosaki **Date:** 03/10/2017

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. 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).

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):

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 / 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.

PACKING SLIP

Invoice Date: September 15, 2016
Work Order: #2712

Note

Spirit of Africa Taxidermy
VAT No: 4750246904

Spirit of Africa Taxidermy
PO Box 1611

37 Ogilvie Road Merrivale/Howick, KZN 3290

Phone: 0333304599 / 082338 7791 / 08256 47557

Sold to: Robert Kiyosaki
(b) (6)
Phoenix Arianna
Arizona
USA

Purchase Items

Qty	Name of Product
1	Set of hippo tusks dip and pack
1	Elephant panel dip and pack
1	Elephant trunk made into gun bag
2	Elephant tusks dip and pack
1	Hippo cape dip and pack
1	Buffalo skull mount

EZEMVELO
KZN WILDLIFE

ORIGINAL

ORDINARY PERMIT

Fee: R 100.00
Receipt No: 2668/2016

Permit No: OP 2516/2016
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)

Robert Toru
Mawana Game Reserve
Black Imfolozi
Vryheid
3300

Residential Address
Mawana Game Reserve
Black Imfolozi
Vryheid
3300

Conservation District: Vryheid
Province: KwaZulu-Natal

In the capacity of Hunting Client
To Hunt, Temporary Possess and Transport the following species of Game

AFRICAN ELEPHANT	*(LOXODONTA AFRICANA)*
1 (One) dead removal	

Hunting Client:
R Toru

(b) (6)
Phoenix Arianna
Arizona
united states of America

Landowner:
Mr. C.M.F. Van der Walt

Mawana Game Reserve
P. O. Box 640
Vryheid
3100

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 29 June 2016

for CHIEF EXECUTIVE

(b) (6)

Permit Holder

EZEMVELO KZN WILDLIFE

Conservation, Partnerships & Ecotourism

ORIGINAL

13. 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.

14 This permit shall be subject to any applicable norms and standards in existence at the time of issuance of this permit.

15. The issuing authority shall determine the species and restricted activities for which this permit will apply

16 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 hu

17 Return the original permit to the issuing authority forthwith after expiry of the permit.

18. To be completed by the landowner after completion of the hunt: Name and signature of the landowner... Species, number and sex of the animals hunted

21 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 an

22. 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 pos

23. The attached return of the hunting permit must be completed by the holder. The completed permit to be returned to the Chief Executive, E KZN Wildlife, P O Box 13053 Cascades, 3202 or emailed to permits@kznwildlife.com upon expiry. Failure to comply with

24 This permit is issued to the client named above and does not entitle the Professional Hunter and/or the Hunting Outfitter to hunt the species listed herein with another client, either on the property stipulated on the permit, or any other, should the hun

25 The Permit Holder may allow a Professional Hunter or his Client to hunt the leopard. HOWEVER the Export of Trophies will not be permitted under any circumstances, and no negotiations will be entered into in this regard.

26 Should the hunt be successful the client must produce a copy of a valid CITES import permit before an export permit will be issued.

28 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 t

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 29 June 2016

(b) (6)

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 Website: www.kznwildlife.com

ORIGINAL

EZEMVELO KZN WILDLIFE

Professional Hunter:
Mr H Skead

P O Box 184
Estcourt
3310

Hunting Outfitter:
Mr H Skead

P.O.Box 184
Estcourt
3310

TERMS AND CONDITIONS UNDER WHICH THIS PERMIT IS ISSUED

1. It is valid only

   (i) from : 13 June 2016
   to : 13 August 2016

   (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.

4 This permit is not transferable

5 Any unauthorised alteration to this permit shall render it invalid

6 This permit/certificate is subject to the provisions of any applicable law in force during the period of validity of the permit/certificate.

7 This permit is valid only within the province where it was issued

8 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.

9 This permit shall be invalid until such time that it is signed by the permit holder.

10 This permit shall be deemed invalid if it is lost or destroyed and no copy thereof shall be issued.

12 The prescribed fee payable for the issuing of this permit shall not be refunded.

Please read the Terms and Conditions under which this Permit Is Issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 29 June 2016

(b) (6)

for CHIEF EXECUTIVE

Permit Holder

EZEMVELO KZN WILDLIFE

ORIGINAL

29. This permit/licence/certificate is issued subject to compliance with all other relevant legislation and does not preclude the permit holder from adherence thereto.

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 29 June 2016

for CHIEF EXECUTIVE

(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: 086 520 3320
Email permits@kznwildlife.com Website: www.kznwildlife.com

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

KZN 030374

Duration of Hunt: Commenced 16/07/2016 Terminated 19/07/2016

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 (MPB)	Western Cape (CNC)	Eastern Cape (EC)	Northen Cape (NC)
X								

Post Permit To (mark correct block with X)

PROFESSIONAL HUNTER

Name: Hamish Snead
Business Address: Lowveld Hunting Safaris P.O Box 184
Estcourt Code: 3310
I.D. No.: 7807 24 5095 089
PH Permit No: 5443/2013
Date: 20/07/2016 Signature:

CLIENT

Name: [redacted]
Permanent Postal Addr[redacted]
Code: [redacted] Country: USA
Passport No. [redacted]
Tel/Fax:
Date: Signatur[redacted]

HUNTING OUTFITTER

Name: Hamish Snead
Business Address: L.H.S. P.O Box 184
Estcourt Code: 3310
I.D. No.: 7807 24 5095 089
Tel.No: 0832970422 Fax: 33263239R
H.O. Permit No: 135/2016
Date: 20/07/2016 Signature:

Farm Name Registration No:	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 ♂	Sex ♀	Part of Trophy to be Exported
Mawana Game Reserve	Kwanti	c/o Van der Spuy Mawana Game Reserve	5516/2016	16/07	19/07/16	Elephant	1	✓		Tusks Skull Skin
Game Reserve		c/o Van der Spuy Mawana Game Reserve								
Mawana	Kwanti	c/o Van der Spuy	2682/2016	16/07	19/07	Hippo	1	✓		Skull + Teeth
Game Reserve		Mawana Game Reserve								

COPIES: Client 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 ..... Remain in book

Address to which trophies are to be sent:

Code:

Country: Trophy Export Date (Estimate):

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, Robert T Kiyosaki
(Full legal name of individual)

residing at (b) (6) Phoenix AZ 85016
(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, 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 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 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;

And 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.

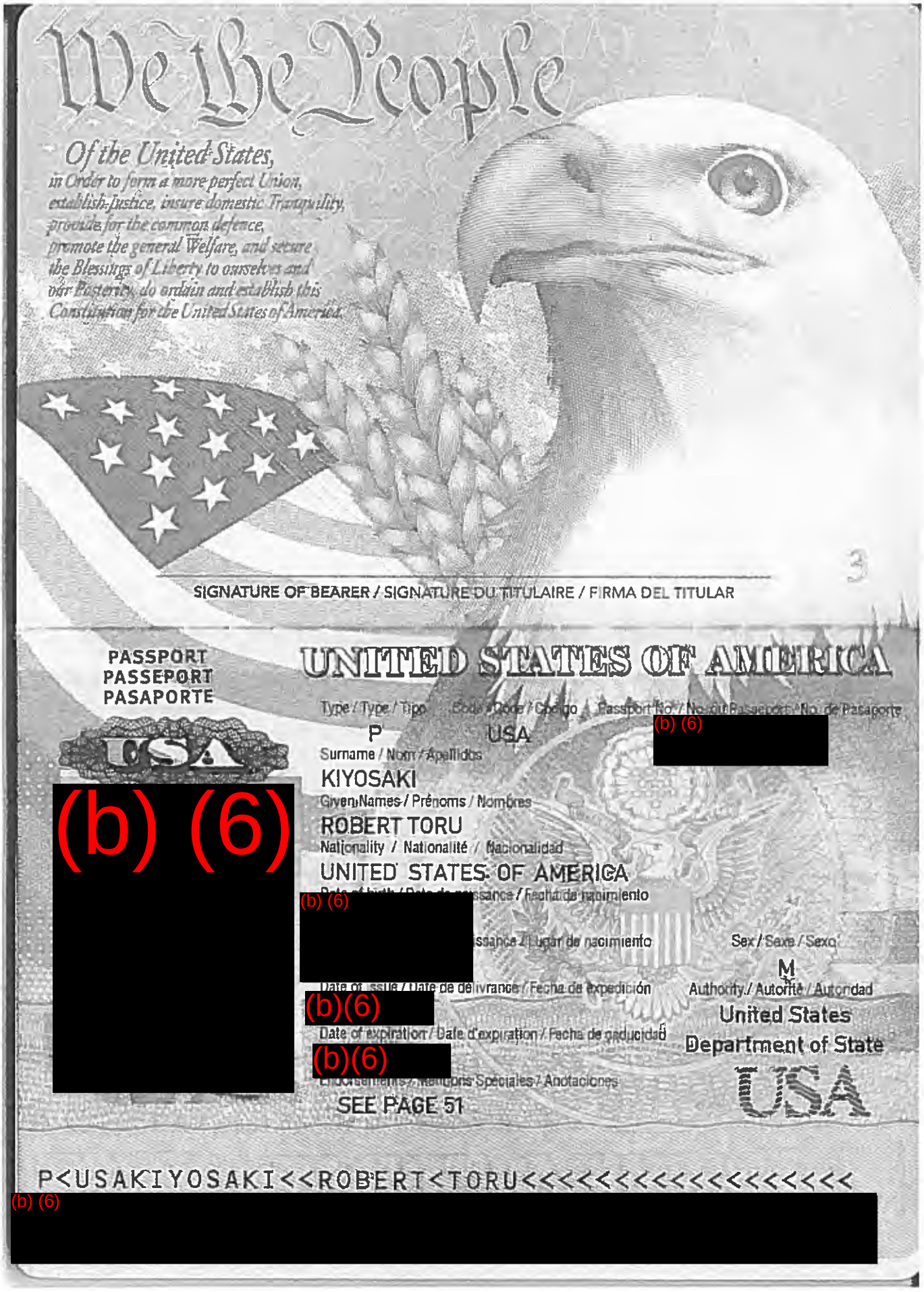
IN WITNESS WHEREOF, the said (Print full legal name) Robert T Kiyosaki

has caused these presents to be sealed and signed: (Signature) (b) (6)

(Capacity) _____ (Date) March 4th 2015

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: 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)


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.
SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR
PASSPORT
PASSEPORT
PASAPORTE
UNITED STATES OF AMERICA
Type / Type / Tipo
P
Code / Code / Código
USA
Passport No. / No. du Passeport / No. de Pasaporte
(b) (6)
Surname / Nom / Apellidos
KIYOSAKI
Given Names / Prénoms / Nombres
ROBERT TORU
Nationality / Nationalité / Nacionalidad
UNITED STATES OF AMERICA
(b) (6)
(b) (6)
Sex / Sexe / Sexo
M
Date of issue / Date de délivrance / Fecha de expedición
(b)(6)
Authority / Autorité / Autoridad
United States
Department of State
Date of expiration / Date d'expiration / Fecha de caducidad
(b)(6)
Endorsements / Mentions Spéciales / Anotaciones
SEE PAGE 51
USA
P<USAKIYOSAKI<<ROBERT<TORU<<<<<<<<<<<<<<<<<<<<
(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.

A. Complete if applying as an individual

1 a. Last name	1 b. First name	1 c. Middle name or initial	1 d. Suffix
Kiyosaki	Robert	T	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6 a. Telephone number	6 b. Alternate telephone number	6 c. Fax number	6 d. E-mail address
(b) (6)	(925) 417 5273	(925) 417 0170	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	1 b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4 a. Principal officer Last name	4 b. Principal officer First name	4 c. Principal officer Middle name/ initial	4 d. Suffix

5. Principal officer title	6. 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 (include if different than mailing address, include Apt #, or Room #, no P.O. Boxes)				
(b)(6)				
1 b. City	**1 c. State**	**1 d. Zip code/Postal code**	**1 e. County/Province**	**1 f. Country**
Pleasanton	CA	94588		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 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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA26762C-0 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001

Atty. In Fact for Robert T. Kiyosaki — 07/30/2018

Signature in blue ink of applicant/person responsible for permit (No photocopied or stamped signatures) — 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 MA26762C-0.

2. Submit the original permit with this application. ATTACHED

3. **Past activities.** N/A
   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:** 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

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA26762C-0
Effective: 04/12/2017 Expires: 04/11/2018

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:
ROBERT T KIYOSAKI
(b) (6)
PHOENIX, AZ 85016
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 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. 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 South Africa.

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).

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 Robert T Kiyosaki
(Full legal name of individual)

residing at (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, 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 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 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;

And 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.

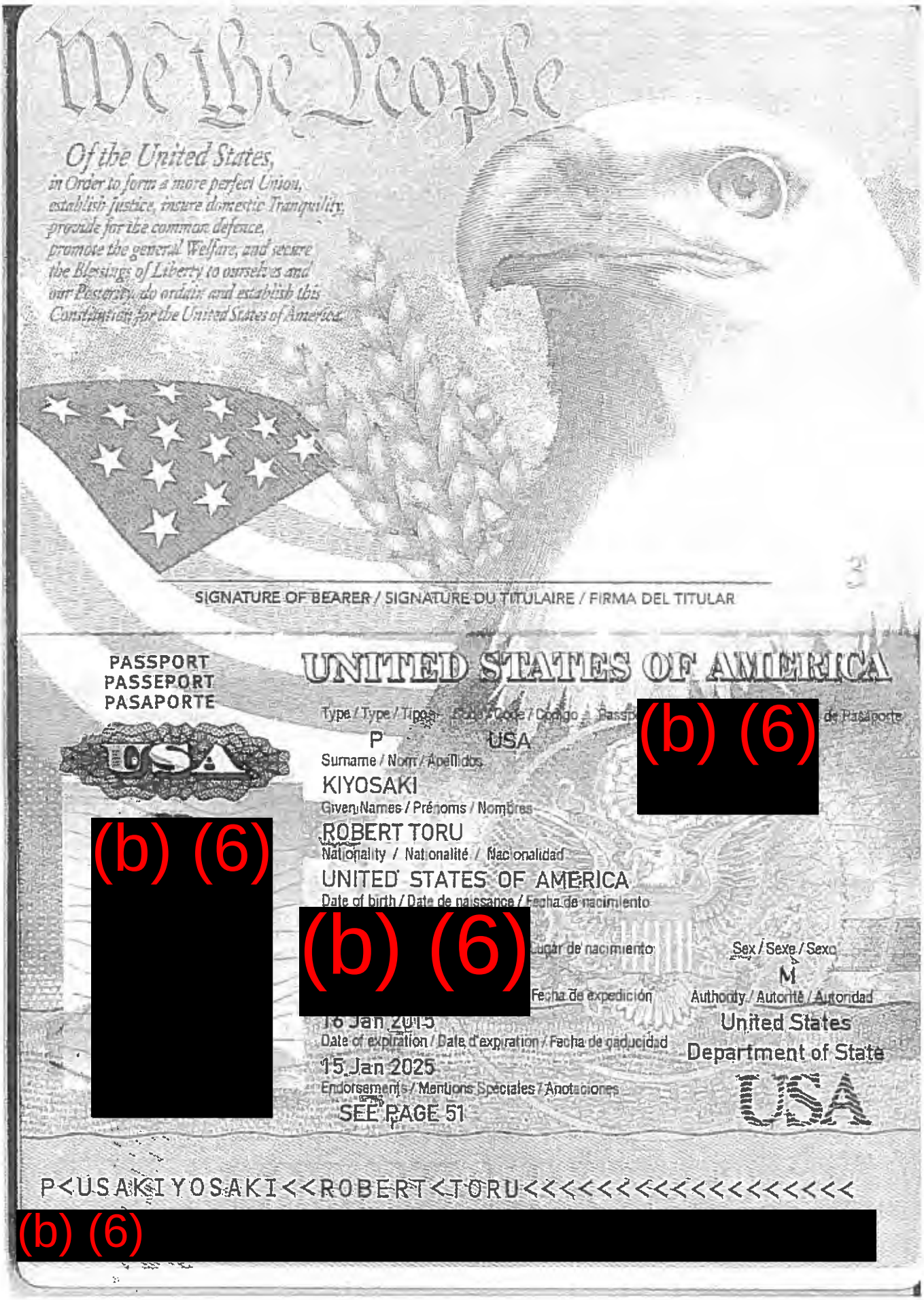
IN WITNESS WHEREOF, the said (Print full legal name) Robert T Kiyosaki

has caused these presents to be sealed and signed: (Signature) (b) (6)

(Capacity) _____ (Date) March 4th 2015

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 duly checks.

(Mandatory requirement to validate this POA: 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)


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.
SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR
PASSPORT
PASSEPORT
PASAPORTE
USA
UNITED STATES OF AMERICA
Type / Type / Tipo
P
Code / Code / Código
USA
Passp
de Pasaporte
(b) (6)
Surname / Nom / Apellidos
KIYOSAKI
Given Names / Prénoms / Nombres
ROBERT TORU
Nationality / Nationalité / Nacionalidad
UNITED STATES OF AMERICA
Date of birth / Date de naissance / Fecha de nacimiento
(b) (6)
Lugar de nacimiento
Sex / Sexe / Sexo
M
Fecha de expedición
Authority / Autorité / Autoridad
16 Jan 2015
United States
Department of State
Date of expiration / Date d'expiration / Fecha de caducidad
15 Jan 2025
Endorsements / Mentions Spéciales / Anotaciones
SEE PAGE 51
USA
(b) (6)
P<USAKIYOSAKI<<ROBERT<TORU<<<<<<<<<<<<<<<<<<<<
(b) (6)

Status of 10493C RENEWAL and 26762C renewal

Brisendine, Amy <amy_brisendine@fws.gov>

Wed 9/30/2020 11:28 AM

To: Maria Felix (b) (6)
Cc: Brisendine, Amy <amy_brisendine@fws.gov>

Hi Maria,

Mary Cogliano asked me to get back to you regarding the status of these two applicaons. I apologiz e for the delay; they are under review. We appreciate your paence.

Best regards,

Amy Brisendine (Acng Chie f, Branch of Permits)
U.S. Fish and Wildlife Service
Internaonal Aff airs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W062C
Falls Church, Virginia 22041
hp s://www.fws.gov/internaonal/permits/
hp s://www.cites.org

Please see our applicaon f orms that are available for on-line submission here: hp s://www.fws.gov/internaonal/permits/ applicaon- forms/index.html

Fw: [EXTERNAL] Fwd: PRT# MA10493C RENEWAL FOR BRUCE BARANY & PRT#MA26762C renewal for Robert Kiyosaki

Cogliano, Mary <mary_cogliano@fws.gov>
Wed 9/30/2020 11:06 AM
To: Brisendine, Amy <amy_brisendine@fws.gov>

Please see below.

Mary Cogliano, Ph.D.
Acting Chief, Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
703-358-1991
USFWS | International Affairs

From: Maria Felix <maria@b.hunter-interna. onal.net>
Sent: Wednesday, September 30, 2020 1:00 AM
To: Cogliano, Mary <mary_cogliano@fws.gov>
Subject: Re: [EXTERNAL] Fwd: PRT# MA10493C RENEWAL FOR BRUCE BARANY & PRT#MA26762C renewal for Robert Kiyosaki

Hello Mary,

Just checking for news on these two applications. The one for Bruce Barany was a renewal.

Appreciate hearing from you.

Warm regards.

Maria Felix
Proud NRA & SCI Life Member
President/CEO
Hunter International Brokerage Services, Inc.

5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588
Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

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On Sun, May 17, 2020 at 3:15 PM Maria Felix <maria@b.hunter-international.net> wrote:

> Hi George,
>
> Hope all's well on your side. Not sure if you and your staff are back in the office now. Can you kindly advise renewal status of Bruce Barany (MA10493C-0 expired 11/20/2017) and Robert Kiyosaki's (MA26762C-0 expired 4/11/2018) elephant permits? Appreciate your usual prompt reply.
>
> Stay safe!

Maria Felix
Proud NRA & SCI Life Member
President/CEO
Hunter International Brokerage Services, Inc.

New Office Address:
5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588
Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

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On Thu, Feb 27, 2020 at 4:03 AM Villavicencio, Jorge <Jorge_Villavicencio@fws.gov> wrote:

> Please Ms. Felix,

There is no need to continue checking. These applications have not been forgotten. When the findings are made and finalized, either positive or negative, the requests will be completed. The applicant will be made aware at that time.

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
Jorge_Villavicencio@fws.gov

The U.S. Fish and Wildlife Service International Affairs Program works to conserve our nation's wildlife and species of international concern. In order to provide our best customer service, we are currently focusing on processing permit applications and are not providing status updates on permit applications at this time. Once you receive your acknowledgement e-mail indicating your application number, please allow us time to evaluate your application. If we need additional information, we will contact you.

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.

From: Maria Felix <maria@b.hunter-international.net>
Sent: Wednesday, February 26, 2020 8:32 PM
To: Cogliano, Mary <mary_cogliano@fws.gov>
Cc: Management Authority, FWHQ <ManagementAuthority@fws.gov>; Permits, FWHQ <permits@fws.gov>; Villavicencio, Jorge <Jorge_Villavicencio@fws.gov>; Lynn Javier <lynn@b.hunter-international.net>
Subject: Re: [EXTERNAL] Fwd: PRT# MA10493C/0 RENEWAL FOR BRUCE BARANY

Thank you Mary! I sincerely appreciate hearing from you. It's been a while.

I will check back with the permits team next month for update.

Respectfully,

Maria Felix
Proud NRA & SCI Life Member
President/CEO

Hunter International Brokerage Services, Inc.

New Office Address:

5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588

Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

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On Wed, Feb 26, 2020 at 3:15 PM Cogliano, Mary <mary_cogliano@fws.gov> wrote:

> Dear Ms. Felix,
>
> I just tried calling you but was unable to reach you. The application you've referenced is a request to renew a permit to import a trophy of an elephant taken in South Africa. Please be aware that on March 1, 2018, we withdrew our country-wide enhancement findings for elephants, and we now make our enhancement findings on an application-by-application basis. The original permit we issued for this import request was based on the country-wide finding that we later withdrew, and we must now make a separate enhancement finding on this permit renewal request.
>
> The application is currently under review. Due to the government lapse in appropriations in 2018, staff vacancies, and additional CITES and ESA listings, our office has a large back-log of permit applications, and I can't give you a definitive date of when this application will be processed. Feel free to check back with me at the end of March, and I will update you on our progress.
>
> Best regards,
>
> Mary Cogliano
>
> ---
>
> **From:** Maria Felix <maria@b.hunter-international.net>
> **Sent:** Tuesday, February 25, 2020 2:04 AM
> **To:** Management Authority, FWHQ <ManagementAuthority@fws.gov>; Permits, FWHQ <permits@fws.gov>

Cc: Villavicencio, Jorge <Jorge_Villavicencio@fws.gov>; Cogliano, Mary <mary_cogliano@fws.gov>; Lynn Javier <lynn@b.hunter-international.net>
Subject: Re: [EXTERNAL] Fwd: PRT# MA10493C/0 RENEWAL FOR BRUCE BARANY

We filed for **RENEWAL** of this 2016-2017 elephant permit in **January 2018** and have not had any update since April 2019 when we were told that the application is assigned to another biologist.

Can you kindly let us know when we can expect to receive this permit? I can send you a prepaid Fedex label if required.

Appreciate hearing from you.

Kind regards.

Maria Felix
Proud NRA & SCI Life Member
President/CEO

Hunter International Brokerage Services, Inc.

New Office Address:
5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588

Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

This e-mail and any attachments are strictly confidential and may contain legally privileged information. If you are not the intended recipient , any use, disclosure or copying of this e-mail is NOT authorized. If you receive this e-mail in error, please notify the above sender immediately and permanently delete or destroy this e-mail.

On Mon, Apr 15, 2019 at 4:41 AM Management Authority, FWHQ <managementauthority@fws.gov> wrote:

> Hello Maria,
>
> Thank you for your inquiry.

This application has been received by our office and has been assigned to one of our Biologist. It is currently at a pending status. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

Respectfully,

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**
Going abroad? Be Informed. Buy Informed.
****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Tue, Apr 9, 2019 at 10:55 PM Maria Felix <maria@b.hunter-international.net> wrote:

> Please advise if this renewal application have been processed and when we can expect to receive the re-issued permit.
>
> Appreciate your prompt reply.
>
> Thank you.
>
> Maria Felix
> ***Proud NRA & SCI Life Member***
> President/CEO
>
> Hunter International Brokerage Services, Inc.
> 5700 Stoneridge Mall Road, Suite 260
> Pleasanton, CA 94588
> Tel (925) 417 5270
> Fax (925) 417 0170
> Email: maria@b.hunter-international.net
> Website: www.hunter-international.net

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

AUG 15 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
KARTES	DALE	F	

(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Naches	WA.	98937	Yakima	USA

(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Naches	WA	98937	Yakima	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)

(b) (6) [redacted]

08/08/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Coppersmith Global Logistics
Attn Jennifer House
3100 S 176th St.
Ste 120 SeaTac, WA 98188

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Dale Kartes
(b) (6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Elephant - one
Blue Wildbeast - one
Impala - Two

b. Sex (if known).

All males

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:

Mapungubwe Game Reserve
(Province) Limpopo, South Africa
(District) Hembe (Physical Address) All days

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Mapungubwe Game Reserve
(Province) Limpopo, South Africa
(District) Hembe (Physical Address) All days

b. Date wildlife was hunted:

10/10/2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

MR E. Small

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

SAFARI TAXIDERMY
47 Goud street
LABORIA, POLOKWANE, RSA

MR E Small
P.O. Box 123
Alldays 0909

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). South African Hunting Register Trophy export application (Enclosed) → AND ORDINARY Permit

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: SAFARI TAXIDERMY
Business Name:
Address: 47 Goud street
City: LABORIA
State/Province: POLOKWANE
Country, Postal Code: RSA

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Yes - is provided with this Application

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

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 landowner that provide a conservation benefit to the species being hunted/species hunted?

included material

OMB Control No 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signatu[redacted] Date: 8/8/2018

Be aware that there may b[redacted]quirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

(Seattle WA) International
17930 International Blvd.
Suite # 500
Seattle, WA. 98188

G.P.-S. 11/13

A. LP No 115351

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt: ..... Commenced 10 / 10 / 2017 Terminated 24 / 10 / 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 (CNC)	Eastern Cape (EC)	Northern Cape (NC)
			X					

POST PERMIT TO (Mark correct block with X)

PROFESSIONAL HUNTER

Name: E Small

Business Address: P.O. Box 123

Alldays 0909

ID No: 6309105066087

PH Permit No: ZA/LP/HO/0754

Date: 23/10/2017 Signature:

CLIENT

Name: DALE FRANKEN Eakes

Permanent Postal Addre[redacted]

Nades Washington

Code: 98937 Country: U.S.A.

Pas[redacted]

Tel/[redacted]

Dat[redacted]

HUNTING OUTFITTER

Name: E. Small

Business Address: P O Box 123

Alldays Code: 0909

ID No: 6309105066087

No: 0795241627 Fax No:

Permit No. ZA/LP/HO/1927

Date: Evtos 23/10/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence no	Date of Hunt From	Date of Hunt To	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
Mapungubwe	Musina	L. Kaum Quest	ZA/LP/N21/0149	12/10	12/10	Impala	Two		X	Skull + Skin
Game	"	"	"	14/10	14/10	Blue wildebeest	ONE		X	Skull + Skin
Reserve	"	"	13832	22/10	22/10	Elephant	ONE		X	Tusks, Skull, Skin feet, Tail

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 Taxidermy

Code: 98937

Country: U.S.A Trophy Export Date (Estimate): 2018

ORDINARY PERMIT

PERMIT NUMBER: O № 13832

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	DET.
ADDRESS	Cnr Munnik & Erasmus
PROVINCE	Louis Trichardt Limpopo

DETAILS OF PERMIT HOLDER

NAME	DALE FRANKLIN	ID NO.	(b) (6)
SURNAME	CARTES	PASSPORT NO.	
	POSTAL ADDRESS		
ADDRESS			
ADDRESS			
ADDRESS			
TOWN			
POSTAL CODE			
PROVINCE			

(b) (6)

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MR D.F CARTES
NAME AND SURNAME: RESPONSIBLE PERSON	MR. E. SMALL
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	MAPUNGUBWE GAME RESERVE
PHYSICAL ADDRESS OF FACILITY	ALLDAYS
DISTRICT	NHEMBE
PROVINCE	LIMPOPO
REGISTERED NAME AND NUMBER (In the case of game farm)	MAPUNGUBWE GAME RESERVE.

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
ELEPHANT	LOXODONTA AFRICANA	MALE	ONE (ONE)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

HUNT ONE CITES ELEPHANT (MALE) ON THE PROPERTY - MAPUNGUBWE GAME RESERVE - ALLDAYS - 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. D.F CARTES
NAME AND SURNAME OF PROFESSIONAL HUNTER (If applicable)	MR. E. SMALL
NAME AND SURNAME OF HUNTING OUTFITTER (If applicable)	MR. E. SMALL
WEAPON AND METHOD OF HUNTING	RIFLE. KALAHARI 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: 09/10/2017 TO: 09/11/2017

RECEIPT NUMBER 1095950 - AMOUNT = R5300-00

WILDLIFE TRADE REGULATION

SIGNATURE OF ISSUING OFFICER: (b) (6)

DATE STAMP: LOUIS TRICHARDT CENTRE

2017 -10- 09

P.O. BOX 3965 LOUIS TRICHARDT 0920
TEL (015) 516 0002

Mapungubwe Game Reserve

P.O. Box 123
Alldays
0909
Republic of South Africa
Tel: 015 575 9939
Fax: 015 575 9940

Email: vhembe@lantic.net

Herewith permission is given to : Dale Franklin Kartes

Passport Nr (b) (6)

From (b) (6)

to hunt on the following properties namely: Parma MS40 , Modena MS13, Sommerville MS9, Onrust MS80, Kruidfontein MR1, Vergenoegd MS7, Montrow MS6, Pont Drift MS12, Buitpan MS79, Princess Royal MS10, known as Mapungubwe Game Reserve.

The hunting will take place from 10 October 2017 till 24 October 2017

Exemption Permit Nr. ZA/LP/VLT/0149; Outfitter Permit Nr: ZA/LP/HO/1927; Professional Hunter Permit Nr: ZA/LP/HO/0754

Special Permit Nr: Elephant 13832

Animals to be hunted:

SPECIE	SEX	NUMBER
Impala	Male	Five
Bushpig	Male	Two
Blue wildebeest	Male/Female	Three
Warthog	Male/female	Three
Steenbok	Male/Female	One
Zebra	Male /Female	Three
Eland	Male	Four
Kudu	Male	Three
Klipspringer	Male	Two
Elephant	Male	One

(b) (6)

E. Small

09 October 2017

(b) (6)

D.F. Kartes

I Tried!

From: Contact2, FWHQ
Sent: Thursday, August 2, 2018 3:44 PM
To: (b) (6)
Subject: Re: [EXTERNAL] New message from Contact Us form

Thank you for contacting the U.S. Fish and Wildlife Service.

--
Thank you for contacting the U.S. Fish and Wildlife Service.

Regards,

Customer Service Center - Tier II
U.S. Fish and Wildlife Service

From: USFWS
Sent: Thursday, August 2, 2018 3:41 PM
To: (b) (6)
Subject: Thank you for your feedback

Thank you for contacting the U.S. Fish and Wildlife Service.

We have forwarded your message to another member of our team who will respond to the questions. You should receive a response within a business week.

For future reference, your message ID number is E00A4886-A7B1-790D-F159C853398075A3.

Regards,
Customer Service Center
U.S. Fish and Wildlife Service

We regret that we are unable to accept replies sent to this mailbox; if you have further questions on this subject please forward this message to contact2@fws.gov If you prefer to contact us by telephone, we encourage you to call our Customer Service Center at 1-800-344-WILD, Monday through Friday from 8 a.m. to 8:00 p.m. eastern time.

U.S. Fish & Wildlife Service

Contact Us

Office of External Affairs

Search

Thanks for your interest in the U.S. Fish and Wildlife Service, a Federal agency within the Department of the Interior. We are happy to hear from you and will make every effort to respond quickly to your question or comments. If you require a faster response, please call 1-800-344-WILD between 8:00 AM and 8:00 PM Eastern Time, Monday through Friday.

Connect With Us

Name: (First/Last optional) Dale Kartes

State/Territory: (required, unless a country other than USA is selected below). Washington

Country: (required) United States

E-mail address: (required only if you would like a response) (b) (6)

Your Comments: (required)

I have spent time trying to do the cities permit I need help! my Phone # is 253-507-0450 please call me as soon as you can. Dale

Submit Form Clear

Mailing Address

U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, DC 20240

Last updated: October 19, 2016

Note! No one called OR Emailed as of 8/10/18

(b) (6)

U.S. Fish & Wildlife Service

E-Permits

Individual Account Profile

Applicant Name | Personal Data | Physical Address | Mailing Address | Certification

The login and account profile are divided into five sections. To enter or edit information, you may scroll down the page or use the navigation bar above to get to each section.

Existing Users: Please review your account profile data and verify it is correct.

Individual Applicant Name

Provide the complete name and address of the responsible individual who will be the permittee if a permit is issued. If you are applying on behalf of a client, the personal information must pertain to the client, and a document evidencing power of attorney must be included with the application.
Use the legal name, which will appear on the face of the permit.

Required fields are indicated with a red asterisk *

Last name	Kartes *
First name	Dale *
Middle name or initial	F
Suffix	

The dba will appear as the second line of the permit address

Affiliation/Doing business as (see instructions)	

Back to top

Personal Data

Date of birth (mm/dd/yyyy)	8/13/1955 *
Occupation	
Telephone number	(b) (6)
Alternate telephone numbe	
Fax number	
E-mail address	(b) (6) *
Confirm E-mail address	*

Back to top

Physical Address

Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)

Street address (line 1) (b) (6) *
Street address (line 2)
Street address (line 3)
City Naches *
State WASHINGTON
* Required if country is U.S.A
Zip code/Postal code 98937
* Required if country is U.S.A
County/Province Yakima
Country U.S.A. *

Back to top

Mailing Address

Mailing Address (include if different than physical address; include name of contact person if applicable)

Contact person (Last name) Kartes
Contact person (First name) Dale
Street address (line 1) (b) (6)
Street address (line 2)
Street address (line 3)
City Naches
State WASHINGTON
ZIP code/Postal code 98937
County/Province
Country U.S.A.

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PRINT YOUR ACCOUNT PROFILE FOR YOUR RECORDS.

<< Back | Exit | Continue >>

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)

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 rd have been repaired. North from here the elephant activity are just impossible to keep up the fence.

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 wal 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 till 9th October 2015 an official game count was conducted at the waterholes as well as with the use of 2 helicopters.. This accounted for a total of 396 elephants for the period. Some groups could have been counted twice at different waterhole. This correlate with previous counts ref EMP(Elephant Management Plan)

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 7th February till 9th February and was a total of 158 elephants at one-time on the property.

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 240 resident and 240 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.

Herd numbers were in access of 80 animals per herd. 115 Near Pontdrift area, 81 near Somervile

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:

An application has been submitted for 10 Cities elephants to be hunted. We are in the process to apply for more Cities elephant permits, after we suffered severe damage to one of our main dams due to the elephants. This must be issued in advance so that the hunting of these animals can be arranged and staggered to chase them out of the area during the year.

We would also like to add another 5 elephants on a management quota that will not be for export, but will be hunted as first a means to try to get to the model stocking rate down to a maximum of 100 animals and also a means to get the elephants to move back to Botswana.

Elephant Management

Desired Total elephant Population Range:

As indicated by our EMP 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 to be hunted. We are in the process to apply for more Cities elephant permits, after we suffered severe damage to one of our main dams due to the elephants. This must be issued in advance so that the hunting of these animals can be arranged and staggered to chased them out of the area during the year

We would also like to add another 5 elephants on a management quota that will not be for export, but will be hunted as first a means to try to get to the model stocking rate down to a maximum of 100 animals and also a means to get the elephants to move back to Botswana.

Financial losses due to elephant activity

Dams;

An amount of just over R2milj was spend in 2014/2015 on repairing and strengthening Lilly dam as well as main dam.

Elephant activity has already start to work of the wall again.

Vergenoegd dam, which was our second biggest dam on the property, wall was washed away with the rain we had on 19 March 2016. The elephants has worked off the dam wall to an-extend that it could not cope with the water anymore. (This dam wall withstood the 2000 and beyond flooding)

Our preliminary quote for repair for this dam wall, will be around R8milj.

Fences;

Fences remains a huge expense as we cannot keep up with maintaining repairs.

We started with electrification but even this get destroyed by the elephants.

The cost of our plains-game species that are escaping is also a big concern.

Fence repairs for 2016 was R260 000.00 for labour only.

Water supply lines;

The water supply to our main lodge Naledi is impossible to maintain as it is just getting to expensive to repair the elephant damage, and we have to make use of inferior boreholes, with water not fit for human consumption so all drinking water have to be bought.

Electrical Cables:

The electrical cable supplying electricity to Naledi Lodge are constantly dug up and pulled apart.

The cost for fault finding and repair was R118 200.00 for 2016

Trees;

Most of our protected trees are destroyed as per our Management Plan. These all have monetary value and we are busy with an assessment.

Conclusion

In 2013 we admitted a Management Plan for our elephant problem as was requested by Nature Conservation.

Wild Life at Mapungubwe Game Reserve 2016

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 count was focused on elephant numbers but plainsgame were also counted.

Farms that were monitored were: Pontdrift, Modena,Parma, Princess Royal, Montrow, Sommerville, Bultpan, Vergenoegd, Onrus, Kruidfontein we used 2 x Robinson R44, helicopters as well as manned waterholes.

On 5 August only Parma, Somerville and Kruidfontein were counted the morning.

Specie	Male	Female	Total
Blesbuck			
Blue Wildebeest			398
Bushbuck			19
Bushpig			78
Cheetah			2
Crocodile			
Duiker			27
Eland			398
Gemsbuck			115
Giraffe			76
Hyena Spotted			8
Hyena Brown			2
Impala			3489
Jackal Black Backed			7
Klipspringer			39
Kudu			325
Leopard			2

Lion	21
Nyala	8
Ostrich	
Red Hartebeest	19
Steenbuck	17
Warthog	49
Waterbuck	416
Wilddog African	6
Zebra	311

ELEPHANT

NB: THESE ELEPHANT HERDS COUNTED ON PONTDRIFT AND MODENA ON, 29 July to 31 July 2016, MOVED BETWEEN MAPUNGUBWE NATIONAL PARK, BOTSWANA AND US DURING THIS PERIOD AND DID NOT MOVE OVER THE TARR ROAD TO PARMA. NONE OF THESE ANIMALS COULD BE IDENTIFIED AS INDIVIDUALS WE SAW BEFORE.

29 July 2016 Pontdrift 16 Elephants (3 x Elderly bulls, 4 x calves 6 x Adult cows, 3 x sub adults

30 July 2016 Pontdrift 48 Elephants. (2 x elderly bulls, 19 x adult cows, 14 x sub adult, 6 x young bulls (sub-adult), 2 x infant, 5 x calves

31 July 2016 Pontdrift 14 Elephants. (2 x elderly bulls, 4 x adult bulls, 4 x cows, 2 x calves, 2 x sub adult)

29 July 2016 Modena 89 elephants. (6 x adult bulls, 11 x calves, rest cows and sub-adults)

30 July 2016 Modena 115 elephants. (5 x adult bulls, 3 x infant, 18 x calves, rest cows and sub adults)

31 July 2016 Modena 121 elephants. (6 x adult bulls, Rest cows, calves sub-adult)

The main lodge is situated at Parma and also one of our big dams

1 August Parma 87 elephants. (2 x Adult bulls, 9 x sub adult bulls, 6 x infant, 10 x calves, 21 x cows, 39 x other)

2 August Parma 7 elephant bulls

3 Aug Parma 94 elephants. (9 x bulls, 9 x sub-adult, 6 x infant, 10 x calves, 21 x cows, 39 x other)

4 Aug Parma 87 elephants. . (2 x Adult bulls, 9 x sub adult bulls, 6 x infant, 10 x calves, 21 x cows, 39 x other

5 August Parma 26 elephants. (3 x adult bulls, 11 x cows, 5 x calves, 7 x sub-adult))

Somerville do not have open water but the elephants drink at Lilly-dam situated on the boundary between Somerville and Princes Royal.

1 August Somerville 59 elephants. (2 x elderly bulls, 3 x adult bulls, 31 x cows, 13 x calves, 10 x sub adult) (*NB. These animals are in three herds and they were also recorded at Lilly-dam drinking at different times*)

2 August Somerville 59 elephants. (2 x elderly bulls, 3 x adult bulls, 31 x cows, 2 x infant, 11 x calves, 10 x sub adult)

3 August Somerville 59 elephants. (2 x elderly bulls, 3 x adult bulls, 31 x cows, 2 x infant, 11 x calves, 10 x sub adult)

4 August Somerville 65 elephants. (1 x elderly bull, 7 +3 x adult bulls, 31 x cows, 13 x calves, 10 x sub adult) NB:*The 7 bulls was counted day before on Parma.*

5 August Somerville 67 elephants. (1 x elderly bull, 7 +3 x adult bulls, 31 x cows, 13 x calves, 12 x sub adults)

One of our big dams is situated on Vergenoegd, more or less in the centre of Mapungubwe Game Reserve, and this dam's wall broke due to elephant activity. There was still water right through the year available though, for the elephants. The helicopter was used from 1 till 5 August and physical counting at the water was conducted from 29 July till 5th August 2016

1 August Vergenoegd 118 elephants. (1 x elderly bull, 8 x adult bulls, 4 x infant, 15 x calves, 41 x cows, rest sub adult) *NB. These elephants came in four separate groups to the water from 10:30 in the morning till 15:00 in the afternoon.*

2 August Vergenoegd 88 elephants (8 x adult bulls, 11 x calves, rest cows and sub adult)

3 August Vergenoegd 108 elephants (11 x calves, 4 x bulls recorded.)

Another big dam is situated at Bultpan at the southern part of Mapungubwe Game Reserve and a lot of elephant activity could be seen but no herds were recorded over this period but only bulls. The elephant herds moved into this area at night and during the day moved to Vergenoegd where they were recorded.

29 July 2016 Bultpan 9 elephants. (All adult bulls, one specific group were 5 bulls together)

30 July 2016 Bultpan 5 elephant bulls

31 July 2016 Bultpan 4 elephant bulls

Kruidfontein is situated on the southern western boundary along the Limpopo river and elephants are moving across from Botswana onto the Reserve. We have seen elephant movement from Kruidfontein through the farm to Botswana on the Northern boundary for the last 3 years which was not recorded before. Bull groups number from 3 to 6 elephants, as well as lone bulls which seems to be the younger adult ones.

29 July 2016 Kftn 23 elephants. (2 x adult bulls, 3 x sub adult bulls, 9 cows, 4 x calves, 5x sub-adult)

30 July 2016 Kftn 17 elephants. (6 x adult bulls, 7x cows, 3 x calves, 4 x sub adult) *NB: 6x bulls were together around my house at KFTN*

31 July 2016 Kftn 97 elephants. (This herd came onto the farm from Botswana and move onto Vergenoegd, which was counted in daytime at the water to be 118 animals.

1 August 2016 Kftn 12 elephants. (3 x adult bulls, 4 x cows, 3 x calves, 2 x sub-adult)

2 August 2016 Kftn 6 x elephant bulls.

3 August 2016 Kftn 17 elephants. (6 x adult bulls, 7 x cows, 3 x calves, 4 x sub-adult)

4 August 2016 Kftn 67 elephants. (6 x adult bulls, rest one herd came in from Botswana)

5 August 2016 Kftn 89 elephants (6 x adult bulls, 4 x infant, 13 x calves, rest cows and sub adult)

(Infant <1 year, calves 1-3 years, juveniles 3-5 years, sub adults 6-10 years, Young adults 10-21, adults 21-35 years, older adults 36-50 years and elderly adults > 50 years)

2 Methods

2.1 Study area

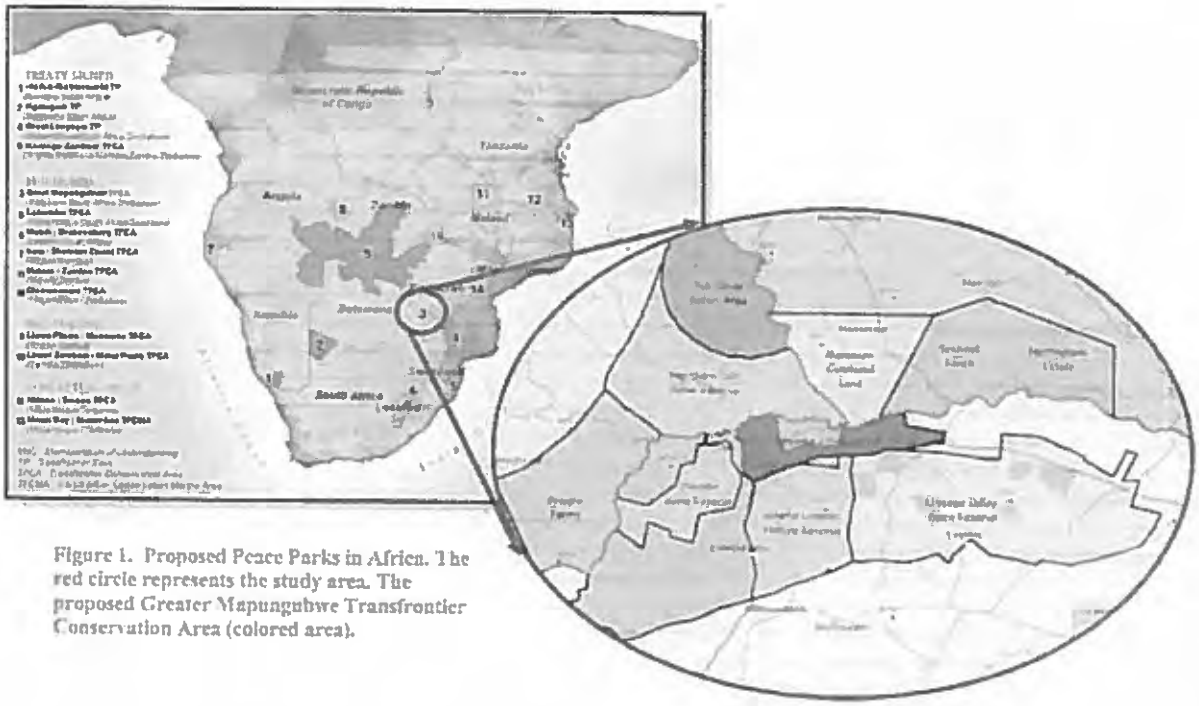


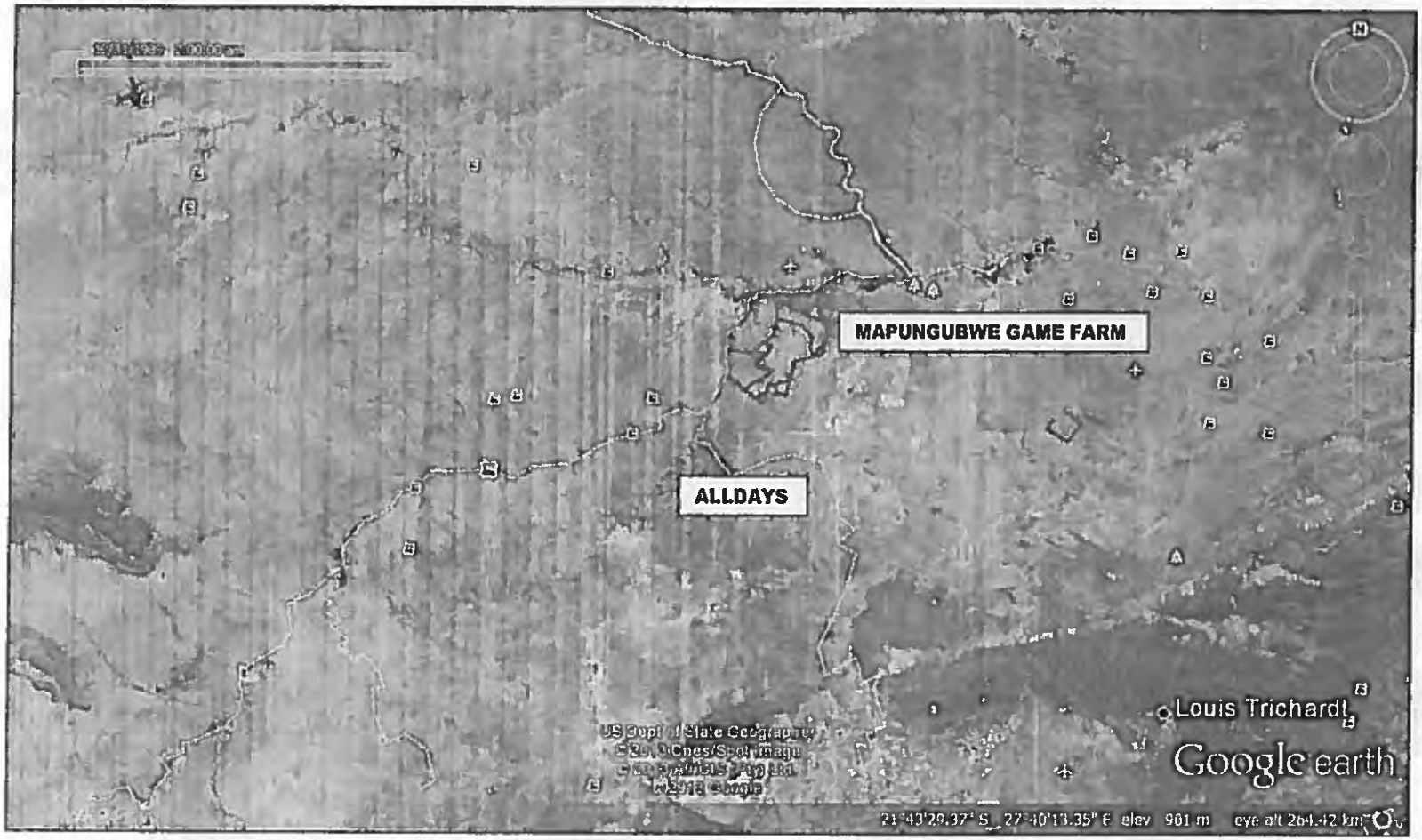
Figure 1. Proposed Peace Parks in Africa. The red circle represents the study area. The proposed Greater Mapungubwe Transfrontier Conservation Area (colored area).

The Greater Mapungubwe Transfrontier Conservation Area (GMTFCA) is one of the 10 Peace Parks created in Southern African, based on International partnerships promoting wildlife conservation, ecotourism and job creation.

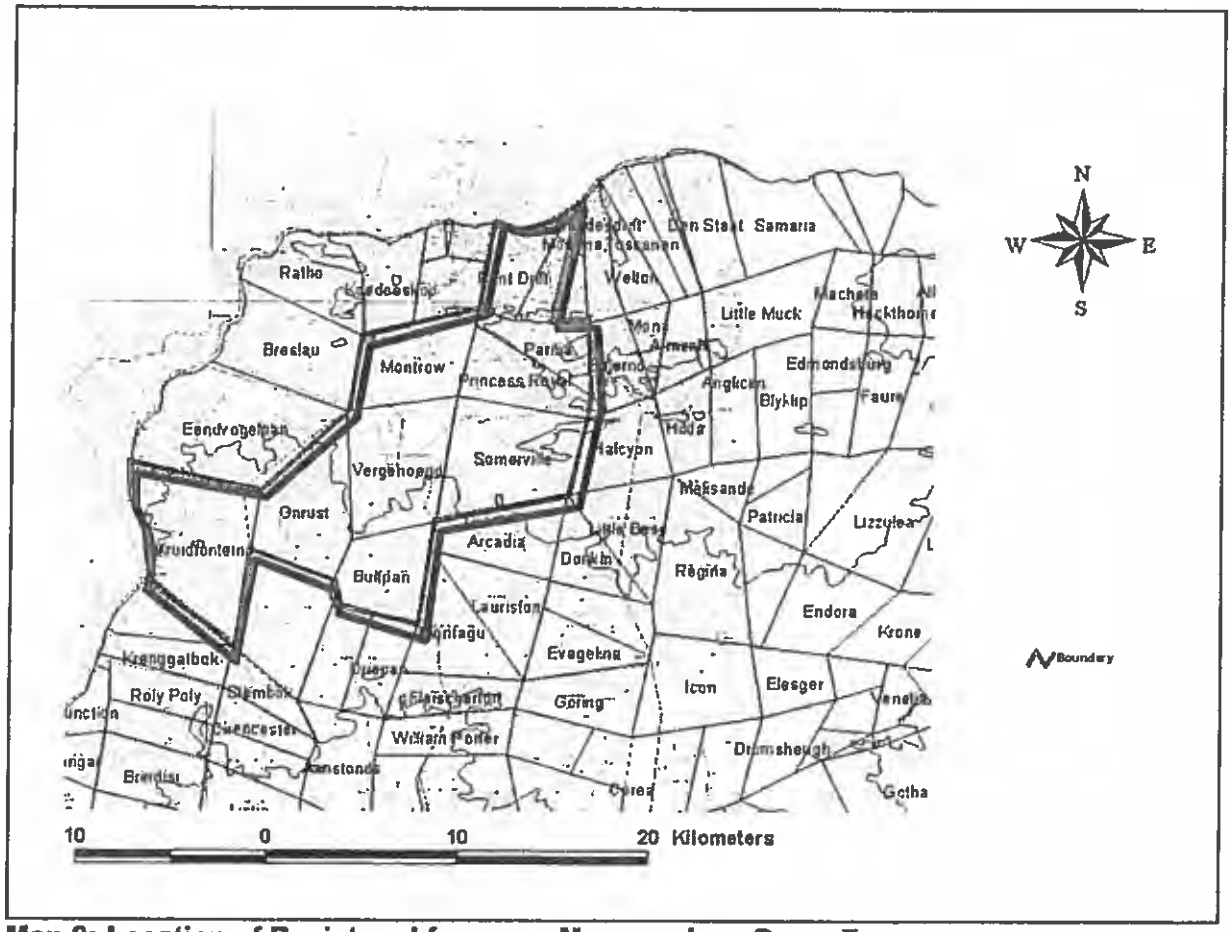
The GMTFCA is an area of utmost importance and chosen by Peace Parks to protect because of the rich and unique biodiversity, the cultural heritage of the archaeological treasures of Mapungubwe and because it is home to the largest population of elephants protected on private land in Africa.

The fieldwork will take place on three reserves:

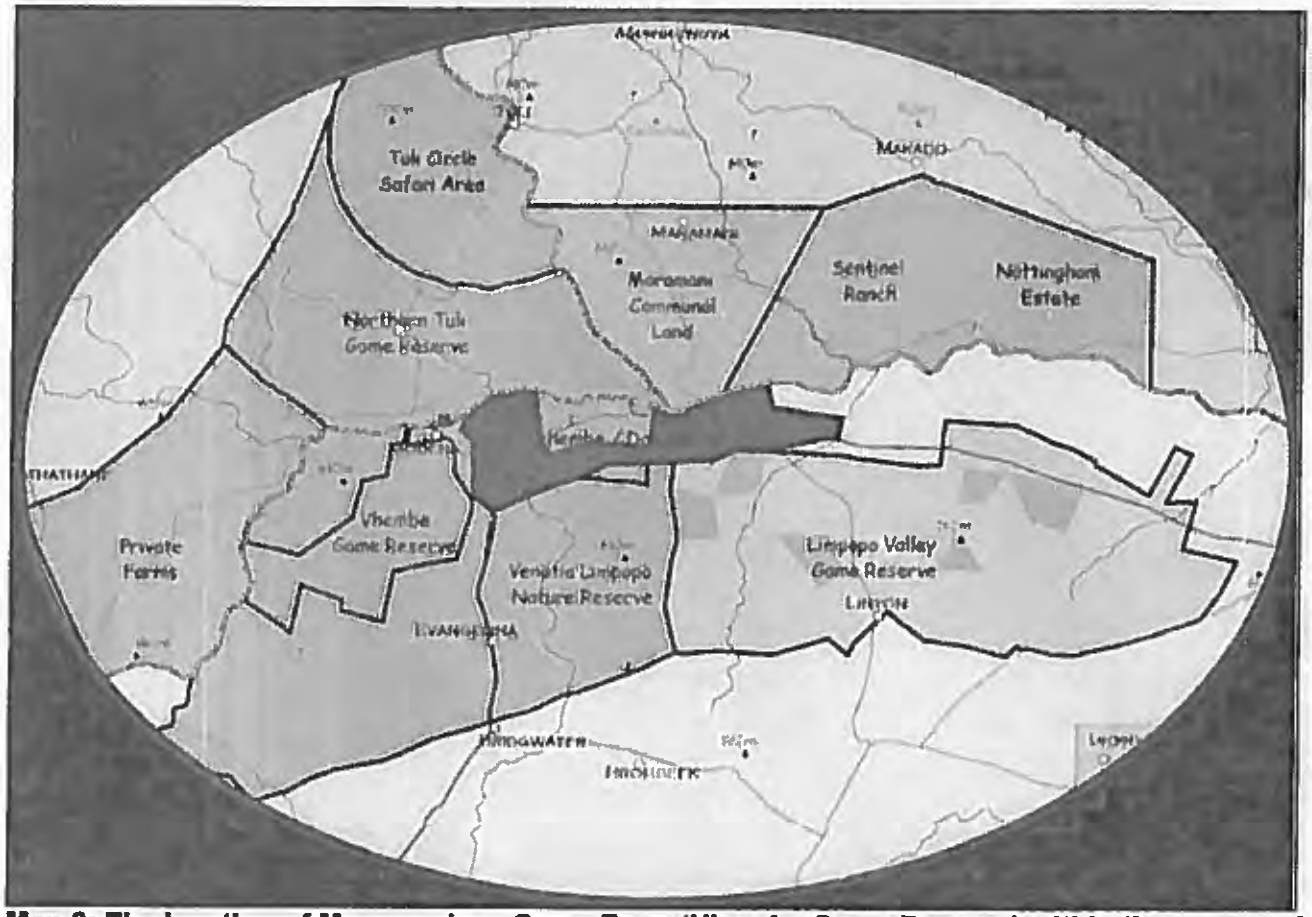
- Vhembe Game Reserve = Mapungubwe Private Nature Reserve (MPNR),
- Mapungubwe National Park (MNP),
- Venetia Limpopo Nature Reserve (VLNR)



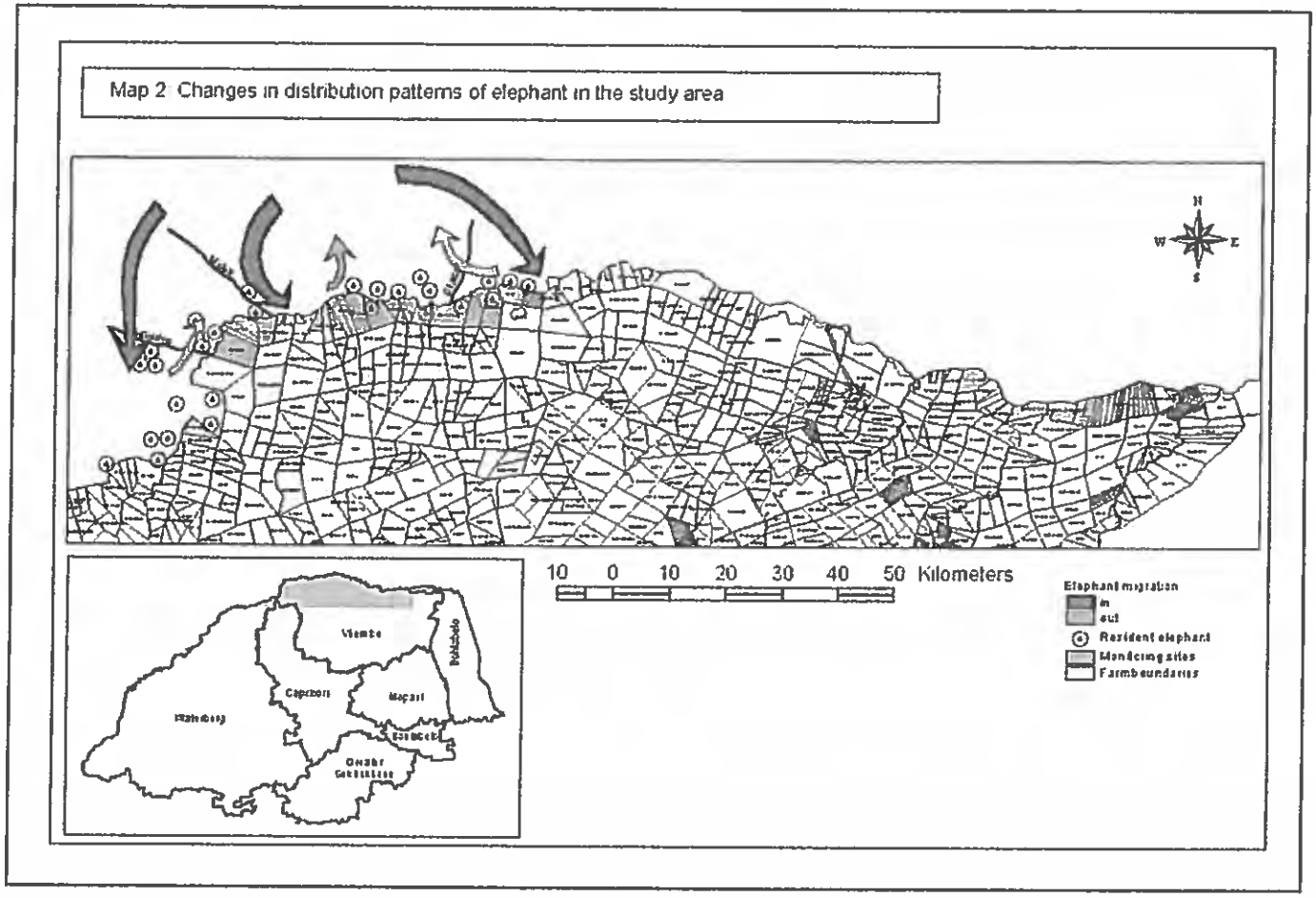
Map 1: Location of Mapungubwe Game Farm



Map 2: Location of Registered farms on Mapungubwe Game Farm



Map 3: The location of Mapungubwe Game Farm (Vhembe Game Reserve) within the proposed Transfrontier Piece Park (Bedetti, 2012)



Map 11: Elephant migration

In This Section

- WHO WE AREMISSIONS & INVOLVEMENTHUNTERSBYLAWS AND POLICIESFISCAL STATEMENTSWHAT WE DOCONSERVATIONHUNTER ADVOCACYFEDERAL AFFAIRSSTATE AFFAIRSSTATE ADVOCACYINTERNATIONAL AFFAIRSCOP17 VOTING GUIDELITIGATIONLITIGATION NEWSLETTER ARCHIVEGUIDANCE FOR RESPONDING TO FWS NOTICESCI-PACFACT SHEETSFIRST FOR HUNTERS BLOGSCI IN THE NEWSACTION CENTERMEMBERSHIP AND CHAPTERSABOUT SCI MEMBERSHIPABOUT SCI CHAPTERSCHAPTER LOCATORSTARTING AN SCI CHAPTERHUNTER HOTLINERECORD BOOKRECORD BOOK NEWSNEW! SUBMIT YOUR RECORD BOOK ENTRIES ONLINEGAME BIRDS OF THE WORLDABOUT SCI RECORD BOOKBENEFITS OF RECORD BOOKFRIEDKIN CONSERVATION FUND MICROLIGHT PROJECTGETTING STARTEDMEASURING PROGRAMSCI MEASURING CORNEROFFICIAL MEASURING FORMSWORLD HUNTING AWARDSSCI LIFETIME ACHIEVEMENT AWARDSSCI AWARD DESCRIPTIONSSCI CANADAHUMANITARIAN SERVICESEDUCATION INITIATIVESEDUCATIONSABLESEVENTSCONVENTIONSPON SORSHIP OPPORTUNITIESMEDIAPRESS ROOMPRESS MEMBERSPRESS VIDEOSPUBLICATIONSADVERTISINGWRITER'S GUIDELINESHUNT FOREVER BLOGVIDEOEVENTJOIN & PARTICIPATEJOIN NOWMEMBERSHIP LEVELSMEMBER BENEFITS AND SERVICESSPECIAL MEMBERSHIP OFFERSCONTRIBUTE OR DONATESHOPUPCOMING CHAPTER FUNDRAISING EVENTSPARTNERSSCI CORPORATE SPONSORSLICENSEESAFFILIATESCELEBRITY PRO-STAFFCAREERSCONTACT SCILIFE HUNTER ADVOCATE SOCIETYSHOPHome/

- What We Do/
- Hunter Advocacy/
- First For Hunters Blog

First For Hunters Blog

USFWS Finding Good For South Africa Wild Lion Import Permits

Oct 02, 2017 Leave a comment

The U.S. Fish & Wildlife Service (FWS) announced the continuation of its positive enhancement finding for the import of legally hunted wild and wild-managed lions from South Africa into the United States. This finding allows the import of wild and wild-managed lions hunted in the 2017, 2018, and 2019 seasons.

There are approximately 2,200 wild lions and 800 wild-managed lions in the country. The positive enhancement finding from the FWS concludes that well-regulated and monitored hunting is beneficial to the species and not a driver of population decline.

The FWS, along with CITES, have recognized the importance hunting plays in conservation. In October 2016, the FWS stated "that sport hunting of wild and wild-managed lions does contribute to the long-term conservation of the species in South Africa," and explained that, "lions are not in trouble because of responsible sport hunting." Wild and wild-managed lions are most threatened by habitat loss, loss of prey and retribution killings during human-wildlife conflict.

According to the FWS, "The presence of private reserves has increased the number and diversity of wildlife in South Africa, thus fueling the hunting industry, which funds the ongoing success of private reserves. It appears that without the hunting industry, these reserves, which have become islands of wilderness in a sea of civilization in much of South Africa, would not be economically viable, and therefore would not exist."

According to the FWS, information received from South Africa's Department of Environmental Affairs reveals that four private reserves in Africa are listed as having wild lion populations at this time. These include the Mapungubwe Game Reserve in Limpopo Province; the Khamab Kalahari Reserve in North West Province; the Associated Private Nature Reserves in Mpunalanga Province; and the Kalahari Oryx Private Game Reserve in Northern Cape Province. Hunters wishing to obtain information about whether the FWS has or will issue import permits for lions taken from these areas should contact the FWS directly.

The majority of lions harvested in South Africa are captive-bred. As SCI reported in October 2016, the FWS made a negative finding for the import of captive-bred trophies. The positive enhancement finding for wild lions does not affect that finding. As a result, hunters continue to be unable to import legally hunted captive-bred lions from South Africa into the United States.

SCI will continue to work with wildlife authority agencies, in conjunction with professional hunting associations, to provide a clear link between the hunting of lions and the enhancement of the species. Scientific principles, not the emotionalism of anti-hunters, should provide the foundation for the management of wildlife and habitat.
Leave a comment

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: five 2016:six 2017: Seven	2015:none 2016:none 2017:one	2015:one 2016:none 2017:none	2015: nine 2016:thirteen 2017:eighteen
Percentage of U.S. clients	2015:80 2016:100 2017:100	2015:0 2016:0 2017:100	2015:100 2016:0 2017:0	2015:10 2016:25 2017:50
Trophy fees paid by U.S. clients	2015:80000 2016:120000 2017:175000	2015:0 2016:0 2017:45000	2015:12000 2016:0 2017:0	2015:30000 2016:35000 2017:63000

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:

$283000.00

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: Eugene Small Title: Manager

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: Mapungubwe Game Reserve
   a. Years in business: 24 years
   b. Name of company conducting hunt: Mapungubwe Game Reserve
   2. Name of concession: Mapungubwe Game Reserve Size in km^2: 250
   a. Land tenure: __ Government lease __ Community X Private ranch __ Private conservancy
   b. Length of concession agreement: N/A Can it be renewed? __ Yes __ No
   c. Length of renewal, if applicable: N/A
   d. Estimated total amount received in trophy fees last year, if applicable: $ 210 000
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: _ Approved Management plan by Nature Conservation and annual report.
   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Alldays Limpopo Province. See attach Map
   g. If the concession borders a national park, please provide the park name: _ Mapungubwe Nat Park
   h. Description of general and distinctive habitat features and any water features: Mopane bushveld with 3 big dams
3. Are there any communities living in the concession? No
   a. If so, estimated number of people or villages in the concession? N/A
4. Are there communities bordering this concession? No
   a. If so, estimated number of people or villages around the concession? N/A
5. Relevant game populations in the concession:[1] See attached documents

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant				
Lion				
Leopard				
Prey species				

6. Total employment number: 11
   a. Please identify the number and type of all employees:

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	3
Trackers	4	4
Anti-poaching scouts/rangers		
Other anti-poaching	4	4
Cooks/housekeepers	6	6
Community coordinators		
Managers	1	1
Biologists	See Attached	
Others: _____		

7. Number of staff employed in the off-season: _____

   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	4	4	Winter
Road opening/construction	7	7	Winter
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: All staff are used for anti poaching when needed but full time 4

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? Both

   c. Months during which anti-poaching patrols are conducted: 12 months

   d. Number of anti-poaching patrols per month: Full time

   e. Description of anti-poaching equipment, vehicles, etc.: Nissan 4x4, clothing camouflage, Binoculars

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Manager

   g. Do you offer rewards to poaching informants leading to arrest? Yes

   h. Do you offer rewards to poaching informants upon conviction? Yes

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

i. 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	R120000.00	R120000.00	R172800.00	
Equipment	R15000.00	R15000.00	R38000.00	Got donations in 2015/16
Vehicles	R110000.00	R160000.00	R234000.00	
Petrol	Not Available	R96 000.00	R156000.00	
Rewards paid	Not available	R27 000.00	R13 000.00	
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	seven	eleven	Three	
Elephant carcasses observed	none	none	none	
Lion carcasses observed	none	none	none	
Leopard carcasses observed	none	none	none	
Ivory poachers arrested	none	none	Three	Stole legal ivory Polygraph
Meat poachers arrested	seven	eighteen	four	
Other poachers arrested	eight	Thirty seven	four	Mainly illegal fishing
Poachers convicted	three	Thirty seven	four	Poachers fined
Snares/gin traps collected	187	347	123	Mainly along Orchard
Firearms confiscated	none	none	none	
Vehicles confiscated	none	one	none	
Bicycles confiscated	none	none	none	
Boats/nets confiscated	14	6	15	Nets
Tusks recovered				Tusks never recovered
Other: _____				

10. Community investment:[3]

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 (e.g., required by law, required by contract, voluntary contribution)? We built and maintain Orphanage voluntary in Alldays Attached documents

c. Does the company provide game meat to nearby communities? Yes our orphanage feed 162 children

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: Monthly basis. In hunting season 80% of carcasses

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. N/A

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? N/A

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Orphanage in Alldays See Attached

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: five 2016:six 2017: Seven	2015:none 2016:none 2017:one	2015:one 2016:none 2017:none	2015: nine 2016:thirteen 2017:eighteen
Percentage of U.S. clients	2015:80 2016:100 2017:100	2015:0 2016:0 2017:100	2015:100 2016:0 2017:0	2015:10 2016:25 2017:50
Trophy fees paid by U.S. clients	2015:80000 2016:120000 2017:175000	2015:0 2016:0 2017:45000	2015:12000 2016:0 2017:0	2015:30000 2016:35000 2017:63000

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:

$283000.00

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____

Name: _____ Title: _____

Rahmqvist Foundation

Toggle navigation

RAHMQVIST FOUNDATION CENTRE

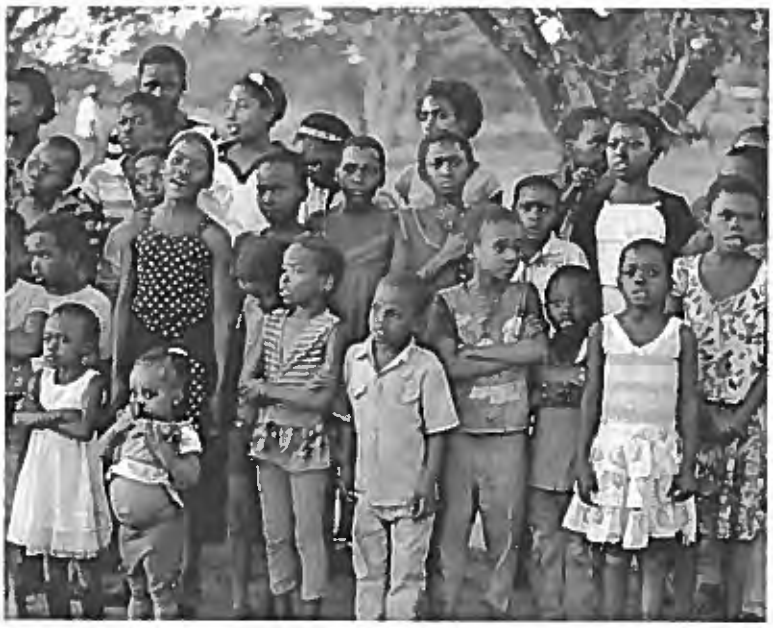
"'All children are entitled to a good start in life with care and a safe shelter. I therefore founded Rahmqvist Foundation in order to build and run an orphanage, to give homeless and vulnerable children a safe place to grow up in."

LEIF RAHMQVIST
Founder and Protector

BACKGROUND

Close to my ranch Mapungubwe Game Reserve, 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.

More about us



ORPHANAGE

To strengthen the orphanage organization we are establishing a partnership with Norsa Community Care.

Read more

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. We have successfully trained two courses of four woman each to became seamstresses, six chef's and still full time training for 2018

Read more

WANT TO HELP?

Rahmqvist Foundation Centre is a charity project. We feed 162 children every day, with meat harvested from my ranch Mapungubwe Game Reserve by local and foreign hunters. Extra 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!

Read more

CONTACT US

TOM L. LEWIS
(b) (6)
Great Falls, Montana 59404
(b) (6)

AUG 1 5 2018

August 10, 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: Import Permit - African Elephant from Namibia

Dear Sirs / Madams:

Enclosed you will find the following:

1. Completed and signed Federal Fish and Wildlife Import Permit Application Form;
2. Copy of Namibia Permit to Hunt Trophies and supporting docs (including elephant);
3. Copy of CITES Export Permit for Loxodonta africana (African elephant);
4. Copy of Namibia Permit to Export Trophies (other animals);
5. Photos of ivory from elephant; and
6. $100.00 check payable to U. S. Fish and Wildlife Service.

Please be so kind as to process the enclosed import permit application for the elephant taken in the Nye-Nye Conservancy during October, 2017. If I have overlooked something you require to process the import permit application or other information you require, please contact me by phone (b) (6) or by email (b) (6)

Thank you.

Sincerely,
(b) (6)
Tom L. Lewis

TLL/del
Encl.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

AUG 15 2018

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Lewis	Tom	L	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Great Falls	Montana	59404	Cascade County	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
same as above

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 8-10-18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Ms. Jennifer House, Import Analyst, Coppersmith Global Logistics, 3100 S. 176th Street, Suite 120, Seattle, Washington 98188

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Tom L. Lewis (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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 information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Nyae-Nyae Conservancy, Namibia. Nearest city or town is Tsumkwe, Namibia.

b. Date wildlife was hunted:

October 1-12, 2017.

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

S. M. Jacobs, P. O. Box 601, Grootfontein, Namibia. SMJ Safaris, same address.

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

African Shipping Services CC, P. O. Box 86877. Eros . 46 TV Moore Street . Southern Industrial Area, 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). See attached.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	S. M. Jacobs, SMJ Safaris
Address:	P. O. Box 601
City:	Grootfontein
State/Province:	
Country, Postal Code:	Namibia

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

I understand the population status of African elephant in the Nyae-Nyae Conservancy is stable or expanding with many mature animals. I observed hundreds of elephants while hunting the conservancy.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

The trophy fee for the elephant was $45,000. There was a also a daily rate plus trophy fees for several other animals I took at Nyae-Nyae. From these funds the San people received payouts for their livelihood, waterholes for elephants and game were financed, people were employed, meat provided, etc

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

In the Conservancy, the San or Bushman community benefits directly by financial payments made by hunting operators. Over 90% of the income to the Conservancy is derived from the hunting concession outfitter. These funds provide for anti-poaching, waterhole development, and income to the people.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: [redacted] Date: 8-10-18

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 governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

This permit replaces permit # 175265

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.:		175263
VALID FROM:		1-10-2017
VALID TO:		14-10-2017
RECEIPT No.:		3160761

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: T Lewis

Residential Address:

Country: USA

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
I	Crocodile	
	Dik-dik	
	Eland	2x
II	Elephant	1x
	Giraffe	1x
	Grey Duiker	2x
II	Hippopotamus	-
	Impala. Black-faced	
	Impala. common	
	Klipspringer	
	Kudu	2x
II	Lechwe	-
	Oryx (Gemsbok)	2x
	Ostrich	2x
	Red hartebeest	2x
	Reedbuck	
I	Rhinoceros, black	
I	Rhinoceros, white	
	Roan	1x
	Sable	-
	Springbok	-

	SPECIES: COMMON NAME	Number
	Steenbok	2x
	Warthog	2x
	Waterbuck	-
	Wildebeest, blue	2x
	Zebra, Burchell's	
II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
I	Cheetah	
I	Leopard	
II	Lion	
*	Other Spotted hyaena	1x
*	Report back within 48 hours after hunt.	

on the following farms / hunting concessions: Naye-Naye Conservancy

Guided by (name of guides): JM Jacobs

MINISTRY OF ENVIRONMENT & TOURISM
ISSUING OFFICER (NAME & SIGNATURE)
UNDER THE AUTHORITY OF THE MINISTER, POWERS ARE GRANTED IN TERMS OF SECTION 78 (L) OF THE NATURE CONSERVATION ORDINANCE, 1975 (ORDINANCE NO. 4 OF 1975) AS AMENDED.

Official MET date stamp
2017 -09- 29

IMPORTANT: This permit is not valid if altered in anyway

typoprint 2931/1 • Tel: 061 228777

The following certificate must be completed immediately after each animal that has been hunted (please print) 175 263

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
1/10/17	Elephant		28,3kg		31,5kg			♂	M.	Nyan-Nyan Cons.			[redacted]	
5/10/17	Roan.	66	67	24	24	181		♂	M.	Nyan-Nyan Cons				
4/10/17	B. Wildebeest.	115		32	32	179		♂	M.	Nyan-Nyan Cons.				
6/10/17	Oryx.	~~74~~	~~73~~	~~19~~	~~19~~	185		♂	M.	Nyan-Nyan Cons.				
6/10/17	Hybrid Spotted	29		18	47			♂	M.	Nyan-Nyan Cons.				
8/10/17	Oryx.	92	92	20,5	20,5	225		♂	M.	Nyan Nyan Cons				

*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 hunding 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.

Reported. R. Jansen. 3/10/2017

Reported. R. Jansen 9/10/2017.

Seal No: AM - 073574
AM - 073572
AM - 073579
AM - 073573

Veterinary Permit No. GRBT 03/2018

8

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 04816

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. **Christian name(s) and surname of applicant:** SM JACOBS
T. Lewis, U.S.A

2. **Identity No. / Passport No.:** —

3. **Residential address:** U.S.A.

Tel No.:

4. **Postal address:** U.S.A.

[redacted] (9) (a)

SIGNATURE OF APPLICANT

5. **From where are products obtained:** Nyae Nyae
Conservancy

6. **The following documents are attached as proof of ownership:**

(a) Permit No. 175338
(b) Permit No.
(c)
(d)
(e)

MINISTRY OF ENVIRONMENT AND TOURISM
DIRECTORATE OF FORESTRY
26 JAN 2018
P. O. BOX 01
WINDHOEK
REPUBLIC OF NAMIBIA
26/01/2018

DATE

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
A04816/01	Buffalo Skull		145	49		49	27.70	NA17 0073 27.70
A04816/02	Buffalo Cape		162	50		50	30.95	NA17 0074 30.95
A04816/03	Elephant Tusks X2							
A04816/04	Elephant Ears X2							
A04816/05	Roan Skull							
A04816/06	Roan Cape							
A04816/07	Blue wildebeest Skull							
A04816/08	Blue wildebeest ~~Cape~~ Skin							
A04816/09	Oryx Skull							
A04816/10	Oryx Cape							
A04816/11	Hyena Skull							
~~SP~~ A04816/12	Hyena Skin							

prime press 052013

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

[Y] EXPORT
[ ] RE-EXPORT
[ ] IMPORT
[ ] OTHER:

0056365
Original

2. Valid until: 04/12/2018

3. Importer (name and address)
Tom L. Lewis
(b) (6)
Great Falls
Montana 59404

3a. Country of import: U.S.A.

4. Exporter / Re-exporter (name,address and country)

Signature of the applicant

5. Special conditions
Not valid if not certified by the Namibian customs
Tusks no's. NA 17 0073 27 70 & NA 17 0074 30 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 air transport, to the IATA Live Animals Regulations.

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)

5b. Security stamp No. 1556630

	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 africen elephant	9. 2x Tusks	10. W	11. 2(two)	11a. 03/03 /2018
	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 progated for commercial purposes
*** for pre-Convention specimens

13 THIS PERMIT IS ISSUED BY

Windhoek — Place
04/06/2018 — Date

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
04 JUN 2018
CITES
WINDHOEK
Private Bag 13306 • Windhoek
Tel: 284823 • 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 13306
Windhoek, Namibia
Enquiries: Chief Warden, Permit Office

Tel +264-61-284 2111
Fax +264-61-258 861

PERMIT No.:	152996 E
VALID TILL:	01 / 12 / 2018
CAPTURE / TROPHY OR OTHER RELEVANT PERMIT	175338 / 18
RECEIPT No.:	5795849

PERMIT TO EXPORT LIVE ANIMALS OR TROPHIES

IMPORT PERMIT:
(Live animals)

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

From: S.M. Jacobs
Postal address: P.O. Box 601
Grootfontein
Namibia

To: Tom L. Lewis
Residential address: (b) (6)
Lane Great falls Montana
59404, U.S.A.

SPECIES: COMMON NAME	SCIENTIFIC NAME	LIVE	SKULL	HORNS	SKIN	SHOULDER MOUNT	OTHER
Baboon CITES II	*Papio ursinus*						
Blesbok	*Damaliscus pygargus phillipsi*						
Cheetah CITES I	*Acinonyx jubatus*						
Eland	*Taurotragus oryx*						
Grey Duiker	*Silvicapra grimmia*						
Impala, common	*Aepyceros melampus*						
Kudu	*Tragelaphus strepsiceros*						
Leopard CITES I	*Panthera pardus*						
Oryx (Gemsbok)	*Oryx gazella*		1x	1xPR	1xCape		
Ostrich	*Struthio camelus*						
Red hartebeest	*Alcelaphus buselaphus*						
Springbok	*Antidorcas marsupialis*						
Steenbok	*Raphiceros campestris*						
Warthog	*Phacochoerus africanus*						
Wildebeest, black	*Connochaetes gnou*						
Wildebeest, blue	*Connochaetes taurinus*		1x	1xPR	1x		
Zebra, Burchell's	*Equus burchelli*						
Zebra, Hartmann's CITES II	*Equus zebra hartmannae*						
Other Buffalo	*Syncerus Caffer*		1x	1xPR	1xCape		
Spotted hyaena	*Crocuta Crocuta*		1x		1x		
Roan	*Hippotragus Equinus*		1x	1xPR	1xBack	1xCape	

IMPORTANT

All exports remain subject to veterinary and import regulations.
This permit is valid for single consignment only.
This permit is not valid if altered in any way.

MINISTRY OF ENVIRONMENT & TOURISM
P.N. Okeyeyeh Kefinre
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.

2018 -05- 31

CITES

CITES Export Permit No.: .....

CITES Import Permit number from importing country (Appendix 1 only) .....

Official Customs stamp at point of export

prime press 032017

Barry, Anna <anna_barry@fws.gov>

Tom Lewis PRT #03109D

1 message

Barry, Anna <anna_barry@fws.gov> Thu, Oct 25, 2018 at 9:44 AM
To: (b) (6)

Dear Mr. Tom Lewis,

The following is in response to your request regarding the status of your application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by-application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African elephant and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. **We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

Tom Lewis PRT #03109D

1 message

Barry, Anna <anna_barry@fws.gov> Thu, Oct 25, 2018 at 3:34 PM
To: (b) (6) JHouse@coppersmith.com
Cc: Emma Nelson <emma_nelson@fws.gov>

Dear Mr. Lewis,

I sent a response earlier today, but, unfortunately the message bounced back.

Anna Barry

---------- Forwarded message ----------
From: **Barry, Anna** <anna_barry@fws.gov>
Date: Thu, Oct 25, 2018 at 9:44 AM
Subject: Tom Lewis PRT #03109D
To: (b) (6)

Dear Mr. Tom Lewis,

The following is in response to your request regarding the status of your application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by-application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African elephant and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

Re: [EXTERNAL] Acknowledgement letter for Permit No. "03109D""

3 messages

Nelson, Emma <emma_nelson@fws.gov> Thu, Oct 25, 2018 at 1:24 PM
To: (b) (6)
Cc: JHouse@coppersmith.com
Bcc: anna_barry@fws.gov

Thank you, Tom, your note. Your application, PRT-03109D, is currently pending. Our office is in the process of making the necessary findings on sport-hunting in Namibia related to your application.

Thank you,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

On Wed, Oct 24, 2018 at 2:57 PM Tom Lewis (b) (6) wrote:

> Dear Ms. Nelson:
>
> You are authorized to discuss the status of my permit application (No 03109D) with Ms. Jennifer House.
>
> Thank you, tom lewis
>
> **From:** Nelson, Emma <emma_nelson@fws.gov>
> **Sent:** Wednesday, October 24, 2018 12:00 PM
> **To:** JHouse@coppersmith.com
> **Cc:** Tom Lewis (b) (6)
> **Subject:** Re: [EXTERNAL] Acknowledgement letter for Permit No. "03109D""
>
> Good afternoon Jennifer,
>
> Once I get the note from Mr. Lewis, I will let you know the status of the application.
>
> Best,
>
> Emma
>
> Emma Nelson

Senior Biologist

U.S. Fish and Wildlife Service

Division of Management Authority

5275 Leesburg Pike,

Falls Church, VA 22041

(703) 358-2296

On Wed, Oct 24, 2018 at 1:56 PM <JHouse@coppersmith.com> wrote:

> Good Morning Emma,
>
> I have copied in Tom Lewis to this email so that he can verify Coppersmith may check on the application status on his behalf. Can you please provide a status update on the status of this permit?
>
> Thank you!
>
> **Jennifer House**
> **Import Analyst**
> *jhouse@coppersmith.com*
> Tel: (206) 242-6181 - ext. 1110
> Fax: (206) 242-0089
> 3100 S 176th St., Ste 120
> Seatac, WA 98188
>
> **Coppersmith Global Logistics**
> **Committed! Connected! Complete!**

Management Authority, FWHQ <managementauthority@fws.gov> Thu, Dec 6, 2018 at 4:07 PM
To: JHouse@coppersmith.com
Cc: Emma Nelson <emma_nelson@fws.gov>, (b) (6)
Bcc: anna_barry@fws.gov

Good afternoon,

Application 03109D continues to be under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS

U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Wed, Dec 5, 2018 at 6:18 PM <JHouse@coppersmith.com> wrote:

Good Afternoon,

Can I get a status update on the application status of Mr. Lewis?

Thank you!

Please note that Coppersmith Offices will be closed Tuesday December 25th in observance of Christmas

Jennifer House
Import Analyst
jhouse@coppersmith.com
Tel: (206) 242-6181 - ext. 1110
Fax: (206) 242-0089
3100 S 176th St., Ste 120
Seatac, WA 98188

Coppersmith Global Logistics
Committed! Connected! Complete!

From: Jennifer House/COPPERSMITH
To: "Nelson, Emma" <emma_nelson@fws.gov>
Cc: (b) (6)
Date: 12/05/2018 03:14 PM
Subject: Re: [EXTERNAL] Acknowledgement letter for Permit No. "03109D""

Good Afternoon Emma,

I wanted to touch base with you to find out if there is any update on the approval on Mr. Lewis Import permit?

Thank you!

Please note that Coppersmith Offices will be closed Tuesday December 25th in observance of Christmas

Jennifer House
Import Analyst
jhouse@coppersmith.com
Tel: (206) 242-6181 - ext. 1110
Fax: (206) 242-0089
3100 S 176th St., Ste 120
Seatac, WA 98188

Coppersmith Global Logistics
Committed! Connected! Complete!

From: "Nelson, Emma" <emma_nelson@fws.gov>
To: (b) (6)
Cc: <JHouse@coppersmith.com>
Date: 10/25/2018 10:46 AM
Subject: Re: [EXTERNAL] Acknowledgement letter for Permit No. "03109D""

Good afternoon Mr. Lewis,

Thank you for your email. I am happy to speak to you on the phone if you would like. I am currently at my desk if you would like to call me. 703-258-2296.

Best,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

On Thu, Oct 25, 2018 at 1:41 PM Tom Lewis (b) (6) > wrote:
Ms Nelson:

Thank you for your response. I was advised by USFWS, before I hunted elephant in Namibia, that the elephant in Bushmanland where I hunted were importable. I don't understand the delay. I respectfully request a phone consult with you to obtain an understanding of your process and when action on my permit request might be concluded.

Thank you, tom Lewis
[Quoted text hidden]

Nelson, Emma <emma_nelson@fws.gov> Mon, Dec 10, 2018 at 6:04 PM
Cc: JHouse@coppersmith.com, (b) (6)
Bcc: anna_barry@fws.gov

Good morning Ms. House,

Thank you for your inquiry. Application PRT-03109D is still under review. We appreciate your patience as we work through our review of the application and the species management within the country.

Best,
Emma

Emma Nelson
Senior Biologist
U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike,
Falls Church, VA 22041
(703) 358-2296

AUG 16 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Sullivan	James	F.	Jr.

(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)

ent #, Suite #, or Room #; no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Sallisaw	OK	74955	Sequoyah	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Sallisaw	OK	74955	Sequoyah	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.

(b) (6)

Sig ed signatures) Date of signature (mm/dd/yyyy) 08/13/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

(b) (6)

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

James F. Sullivan, Jr.

(b) (6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

L. 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:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Republic of South Africa, Province of Limpopo, District of Mopani, Croc Ranch, near city of Phalaborwa

b. Date wildlife was hunted:

June 29, 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Zander Osmers Safaris with Zander Osmer and Charl Osmer

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Life Form Taxidermy, No. 7 Aluminum Road, White River, Mpumalanga, 1240
Republic of South Africa, Attention: Annelle Scott, Office Supervisor

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). The permit is attached as requested.

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, White River
City:	Mpumalanga
State/Province:	Limpopo
Country, Postal Code:	Republic of South Africa

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

The population in the area was very healthy and trending upward. There was actually an overabundance of elephants in the area and they were causing extraordinary damage to habitat.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

I believe the fees were approximately $400.00 US. They were paid to the Government. I paid a trophy fee of $40,000 US which was split between the concessioner of the hunt area and the PH. The meat was distributed to the nearby village. The concession of the hunt area used fees for protecting the 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 landowner that provide a conservation benefit to the species being hunted/species hunted?

I specifically inquired into this matter and was told by the concession holder and PH that they both contribute their own time and money (and equipment - helicopters) for breeding, protection and health of the elephants. Many indigenous villagers are employed by PH and the concessionary.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signatu[redacted] Date: 08/13/2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

DEPARTMENT: ENVIRONMENT AND TOURISM — PERMIT NUMBER: 1 1469

IC SERVICE CENTRE

NAME	P.O. BOX 1406
ADDRESS	HOEDSPRUIT
	1380
PROVINCE	LIMPOPO PROVINCE

DETAILS OF PERMIT HOLDER

NAME	J. F.	ID NO.	—
SURNAME	Sullivan	PASSPORT NO.	(b) (6)

POSTAL ADDRESS

ADDRESS	
ADDRESS	
ADDRESS	
TOWN	
POSTAL CODE	
PROVINCE	

(b) (6)

USA

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	F. Shaw
NAME AND SURNAME: RESPONSIBLE PERSON	F. Shaw
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Brits Branch
PHYSICAL ADDRESS OF FACILITY	Phalaborwa
DISTRICT	Mopani
PROVINCE	Limpopo
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(if known)		(if applicable)
Elephant	L. africana	male	one (1)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Hunt one elephant bull at Brits Ranch

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)	J.F. Sullivan
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	A. Carter
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	C. Carter
WEAPON AND METHOD OF HUNTING	Rifle / Walk-n-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	

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

DEPARTMENT: ENVIRONMENTAL AFFAIRS
ENVIRONMENT AND TOURISM

PERMIT NUMBER: [illegible] № 1 469

KLASERIE SERVICE CENTRE
NAME: P.O. BOX 1408
ADDRESS: HOEDSPRUIT
1380
PROVINCE: LIMPOPO PROVINCE
MOPANI DISTRICT

DETAILS OF PERMIT HOLDER

NAME	J. F.	ID NO.	—
SURNAME	Lullivan	PASSPORT NO.	(b) (6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS		(b) (6)
ADDRESS		
ADDRESS		
TOWN		
POSTAL CODE		
PROVINCE		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	F. Shaw
NAME AND SURNAME RESPONSIBLE PERSON	F. Shaw
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Bros Ranch
PHYSICAL ADDRESS OF FACILITY	Phalaborwa
DISTRICT	Mopani
PROVINCE	Limpopo
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(if known)		(if applicable)
Elephant	L. africana	male	one (1)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Hunt one elephant bull on Bros Ranch

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)	J.F. Lullivan
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	A. Oakes
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	E. Gryer
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 VALIDITY

PERIOD OF VALIDITY FROM: 28/06/2017 TO: 31/08/2017

RECEIPT NUMBER: EC 109163

SIGNATURE OF ISSUING OFFICER:

DATE STAMP: 28 JUN 2017

(b) (6)

PERMIT HOLDER:

P.O. BOX
TEL

Supplemental Information
To
Federal Fish and Wildlife Permit Application
Section E. 9.
(for James F. Sullivan, Jr.)

The concession hunted contained, according to information provided by the manager and the PH, a healthy, well diversified (in sex and age), population of elephants that freely ranged in an area of (to the best of my recollection) approximately 80,000 acres.

The elephants were naturally divided into several herds and while hunting and searching for tracks of a mature bull, the damage to the trees and browsable food supply was very, very noticeable.

The concession is regulated by the Limpopo conservation officials and the permit process is very strict. We were kept waiting several days while the Limpopo officials completed their tasking of confirming the need to take a mature bull from the herd on the property.

In talking with the manager of the concession and by simple observation it is easy to understand that the cost of such an operation (containing many, many species of animals in addition to the elephants) is enormous. The maintenance of the property to protect it from poachers, to allow access to sick animals, to fight fires and to provide employees of the concession with access to protect the animals and to observe the habitat and the condition of the property and the animals has to be enormous.

The manager of the concession advised me that every penny made from the hunt goes back into the property and the animals to continue the operation. He advised me that even with the abundance of the population and the resulting damage to the habitat that permits were scarce and that revenue was suffering.

Many employees of the concession were observed and the improvements to the concession were readily observable. The only revenue for the operation is from hunters and photographic safaris. The revenue from this and other hunts provides the revenue for the enormous amounts of money spent for the conservation of elephants and other species. The meat from the elephant was portioned out among the villagers and the process was quite amazing to observe. The villagers lined up with sacks and bowls to take their portion of the meat from the elephant.

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

AUG 2 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 IA
5275 Leesburg Pike
Falls Church VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1 a Last Name	1 b First Name	1 c Middle Name/Initial	1 d Suffix
Dewett	Justin	C	

2 Date of Birth (mm/dd/yyyy)	3 Telephone Number	3 a Alternate Telephone Number	4 E-mail address
(b) (6)			(b) (6)

Section B: Complete if applying on behalf of a business, cor

1a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1 a Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1 b City	1 c State	1 d Zip code/Postal code	1 e County/Province	1 f Country
Shreveport	LA	71101	caddo	USA

2 a Mailing address (include if different than physical address, include name of contact person if applicable)
(b) (6)

2 b City	2 c State	2 d Zip code/Postal code	2 e County/Province	2 f Country
Shreveport	LA	71101	Caddo	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.

(b) (6)

ures) Date of signature (mm/dd/yyyy)

8/20/18

t 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.

Darbi Rice [redacted] Shreveport, LA 71101

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Darbi Rice [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.

African Elephant - Loxodonta

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:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

N/A

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

Zimbabwe, South Stangani Ranch, nearest city Gwem G.P.S. = 35 K 0738704 7840479

b. Date wildlife was hunted:

9-16-17

2017 OFFTAKE QUOTAS FOR ALIENATED LAND

NAME OF PROPERTY: South Shangani

LANDOWNER: Lemon Safaris

SIZE OF PROPERTY Ha: 7050

PROVINCE: Midlands

DISTRICT: Shangani

Species	Owner's Population Estimate	ZPWMA population estimate	Previous Quotas									
			2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Baboon(m)	500	500	15	10	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)
Bushpig	200	150	4	4	4(four)	4(four)	4(four)	4(four)	4(four)	4(four)	4(four)	4(four)
Caracal	50	50	2	1	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Civet	50	50	2	1	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Cheetah(m)	6	6	0	0	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Duiker	200	200	6	6	6(six)	6(six)	6(six)	6(six)	6(six)	6(six)	6(six)	6(six)
Eland(m)	500	500	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	3(three)
Elephant(m)	Migratory	Migratory	1	1	2(two)	1(one)	2(two)	3(three)	3(three)	3(three)	1(one)	2(two)
Francolin	3000	3000	100	100	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)
Gerret	50	50	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Guinea Fowl	1000	1000	100	100	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)	100(one hundred)
Gurrale (m)	60	40	0	0	0(zero)	0(zero)	0(zero)	1(one)	1(one)	1(one)	1(one)	1(one)
Impala(m)	850	600	25	25	25(twenty five)	25(twenty five)	25(twenty five)	25(twenty five)	25(twenty five)	25(twenty five)	25(twenty five)	25(twenty five)
Impala(f)	850	600	0	0	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	50(fifty)	50(fifty)
Honey badger	50	50	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)
Hyena Spotted	24	20	0	0	0(zero)	0(zero)	0(zero)	1(one)	1(one)	1(one)	1(one)	1(one)
Jackal	50	50	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Klipspringer(m)	40	40	1	1	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)	1(one)
Kudu (f)	400	300	0	0	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)
Kudu(m)	350	350	5	5	6(six)	5(five)	6(six)	6(six)	6(six)	6(six)	10(ten)	10(ten)
Leopard(m)	40	40	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	6(six)	6(six)
Monkey(m)	400	400	10	10	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	10(ten)	2(two)	2(two)
Porcupine	100	100	0	0	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	10(ten)	10(ten)
Reedbuck(m)	100	100	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	1(one)	1(one)
Sable(m)	150	150	3	3	3(three)	3(three)	3(three)	3(three)	3(three)	3(three)	2(two)	2(two)
Serval	50	50	2	2	2(two)	2(two)	2(two)	2(two)	3(three)	3(three)	3(three)	3(three)
Steenbok(m)	100	100	4	4	4(four)	4(four)	4(four)	4(four)	4(four)	4(four)	4(four)	4(four)
Tsessebe(m)	150	150	4	4	4(four)	4(four)	4(four)	4(four)	4(four)	4(four)	4(four)	4(four)
Waterbuck(m)	25	00	0	0	0(zero)	0(zero)	0(zero)	1(one)	1(one)	1(one)	1(one)	1(one)
Warthog(m)	300	200	4	4	6(six)	4(four)	8(eight)	8(eight)	8(eight)	8(eight)	8(eight)	8(eight)
Wildebeest(m)	200	180	0	6	6(six)	6(six)	6(six)	6(six)	6(six)	6(six)	6(six)	6(six)
Wildebeest(m)	200	180	0	0	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	0(zero)	10(ten)	10(ten)
Wildcat	50	50	2	2	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Ostrich	80	0	0	0	0(zero)	0(zero)	2(two)	2(two)	2(two)	2(two)	2(two)	2(two)
Zebra	120	120	4	6	6(six)	6(six)	6(six)	6(six)	6(six)	6(six)	6(six)	6(six)

Property is game fenced

ACTING CHIEF ECOLOGIST

ACTING DIRECTOR CONSERVATION

ACTING DIRECTOR GENERAL

BOARD CHAIRMAN

SECRETARY FOR ENVIRONMENT WATER AND CLIMATE

MINISTER OF ENVIRONMENT WATER AND CLIMATE

[redacted]

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Hallamore Hunts, Lou Hallamore

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
4th Josiah Chinamano Rd Belmont Bulawayo Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Trophy Consultants International
Business Name:
Address: 4 Josiah Chinamano Rd
City: Belmont
State/Province: Bulawayo
Country, Postal Code: Zimbabwe

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

2017 Offtake Quotas form 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?

I ~~don't~~ do not remember the fee.
However, fees are used to employee workers
Keep & Maintain Hunting grounds etc.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

NO

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 8 August 2017

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Lenton Safaris who have applied for permit to hunt 1 x elephant and 1 x leopard with client Justin C. Dewett in the following properties:

- South Shangani in Shangani District Midlands Province **from 4 September to 17 September 2017**

The hunt will be under the guidance of professional hunter Lou Hallamore PH license number 417.

Kindly find attached application from the operator and copies of 2017 hunting permit and quota.

Recommended/ ~~Not Recommended~~ 16/08/17
Investigation and Security Manager **Date**

Approved/ Not ~~Approved~~: 10/8/17
Head Management Services **Date**

Parks and Wildlife Management Authority
16 AUG 2017
HEAD OFFICE
P. O. BOX CY 140 CAUSEWAY, HARARE
TEL (04) 707624-9/792783-9

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000079476
PRE_ACQUITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Lenton Ranch Safaris	**Client's Full Name**	Justin C. Dewett
ZTA (HOP) No.	HOP0088	**Passport Number**	(b) (6) [redacted]
		Country of Issue	UNITED STATES
Address	35 Chaplin Rd, Khumalo, - P O Box 202, Bulawayo C M Lennox office@shanganihunting.com	**Address**	(b) (6) [redacted] Louisiana, USA
Name of Professional Hunter	LOU HALLAMORE	**Licence No.**	417
Telephone		**Fax**	N/A

Number of Accompanying Guests	0
Are the trophies being exported after tanning and mounting?	No
Are the trophies being exported after primary treatment?	Yes

Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	Maple freight	Address	4th Josiah Chinamano Road Belmont Bulawayo Zimbabwe
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	South Shangani Ranch	Midlands	
2	Woodend	Midlands	
3			
4			
5			
6			
7			
8			
9			

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	South Shangani Ranch	417426	16-SEP-2017	44	10,000
2	WARTHOG	M	Killed	South Shangani Ranch	411432	09-SEP-2017	34	400
3	ELAND	M	Killed	South Shangani Ranch	426432	08-SEP-2017	82	1,200
4	SABLE ANTELOPE	M	Killed	South Shangani Ranch	385409	06-SEP-2017	92	5,000
5	ZEBRA	M	Killed	South Shangani Ranch	383431	05-SEP-2017		1,000
6	IMPALA	M	Killed	South Shangani Ranch	414452	07-SEP-2017		150
7	IMPALA	M	Killed	South Shangani Ranch	410443	11-SEP-2017		150
8	IMPALA	M	Killed	South Shangani Ranch	408477	04-SEP-2017		150
9	IMPALA	M	Killed	South Shangani Ranch	340445	09-SEP-2017		150
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
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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). 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 [redacted] a leopard trophy. I understand that I may only import two

Applicant's signatu[redacted] Date: 8/20/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign 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).

Form 3-200-19

OMB Control No. 1018-0093
Expires 08/31/2020

AUG 3 0 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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Shifflett	Robert	Gerald	

(b) (6)

Section B: Complete if applying as a business, 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, rural route, apartment, etc.)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Afton	VA	22920	Albemarle	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

08-26-2018

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.

Robert ShiFFlett
(b) (6)
Afton, VA 22920

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Robert ShiFFlett
(b) (6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. 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):

Elephant : Quantity - (1)

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).

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:

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:

   South Africa: Lephalale, Limpopo province

   e. Date wildlife was hunted: August 18, 2017

   f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   RH Heuser
   Kwalata Wilderness
   Lephalale

   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]:

   African Legacy Logistics
   Johannesburg, 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 attachment

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: Brett Piddock
   Business Name: African Legacy Logistics
   Address:
   Address: 40 Kokkewiet Street
   City: Johannesburg
   State/Province: Gauteng province
   Country, Postal Code: South Africa

CERTIFICATION STATEMENT (original signature must be provided for either 9 or 10 below)

N/A 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: _[redacted]_ Date: 08-26-2018

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.

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).**

PERMIT / CERTIFICATE № 222150 222150

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

☑ EXPORT
☐ RE-EXPORT
☐ IMPORT
☐ OTHER

ORIGINAL

2 Valid until: 2018/11/24

3. Importer (name and address)
ROBERT SHIFFLETT
(b) (6)
AFTON VA, 22920

3a. Country of Import: ~~UNITED STATES OF AMERICA~~ UNITED STATES OF AMERICA

4. Exporter / Re-exporter (name, address and country)
BULL'S EYE TAXIDERMY
OPEN SEASON FARM, CORNER
MELKRIVIER AND STERKSTROOM ROAD
VAALWATER 0530 SOUTH AFRICA

5. Special conditions
PERMIT IS INVALID WITHOUT ANNEX A
ADDENDUM SECURITY STAMP:1374144
TUSK#S: ZA 17 2236 5 LP & ZA 17 2236 5 LP ✓

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): H

5b. Security stamp No.: 1374202

	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 AFRICAN ELEPHANT *loxodonta africana*	9 TUSK[TUS]	10. II W	11 1 ONE	11a. 46/300/2018
	12. Country of origin* ZA	Permit No.	Date	12a. Country of last re-export / Certificate No.	Date	12b. No. of the operation ** or date of acquisition ***
B	7.8 AFRICAN ELEPHANT *loxodonta africana*	9 TUSK[TUS]	10. II W	11 1 ONE	11a. 47/300/2018
	12. Country of origin* ZA	Permit No	Date	12a. Country of last re-export / Certificate No.	Date	12b. No. of the operation ** or date of acquisition ***
C	7.8 AFRICAN ELEPHANT *loxodonta africana*	9 TROPHY[TRO]	10. II W	11 1 ONE	11a.
	12. Country of origin* ZA	Permit No	Date	12a. Country of last re-export / Certificate No.	Date	12b. No. of the operation ** or date of acquisition ***
D	7.8 NIL *nil*	9	10.	11. 0	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

CHIMANZI IA

CITES 1374202

MOLOKWANE 2018/05/24

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	
B	
C	
D	

15 Bill of Lading/Air Waybill Number

Port of Export | Date | Signature | Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2821)

PERMIT / CERTIFICATE № 222150

Annexure A

ADDENDUM TO SOUTH AFRICAN CITES EXPORT / IMPORT PERMIT NUMBER 222150

ALSO ISSUED ACCORDING TO NEMBA ACT 10 OF 2004: TOPS REGULATIONS

Item Number	Scientific Name	Common Name	Description	Appendix / Source	Quantity
1	Loxodonta Africana	African elephant	Neck mount	II W	1
2	Loxodonta Africana	African elephant	Tail	II W	1
3	Loxodonta Africana	African elephant	Bones	II W	6
4	Loxodonta Africana	African elephant	Panels	II W	3
5	Loxodonta Africana	African elephant	Ears	II W	2
6	Loxodonta Africana	African elephant	Gun bag	II W	1
7	Loxodonta Africana	African elephant	Belts	II W	2
8	Loxodonta Africana	African elephant	Knot bags	II W	2
9	Loxodonta Africana	African elephant	Princess bag	II W	2

SECURITY STAMP NUMBER: 1374144

CITES 1374144

ISSUED BY: CHIMANZI IA
AT: POLOKWANE **DATE:** 2018/05/24

EXPORT ENDORSEMENT:

ITEM NUMBER	QUANTITY
1	
2	
3	
4	
5	
6	
7	
8	
9	

Port of export ..... Date ..... Signature ..... Official stamp & title .....

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 51624

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 14 / 05 / 2017 Terminated 22 / 05 / 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)	X	North West (NW)		Mpumalanga (MPA)		Western Cape (WC)		Eastern Cape (EC)		Northern Cape (NC)	

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: [illegible]

Business Address: [illegible]

Code:

ID No:

PH Permit No: ZA/LP/[illegible]

Date: 22/05/17 Signature:

CLIENT

[redacted]

HUNTING OUTFITTER

Name: [illegible]

Business Address: [illegible] Code:

I D No:

Tel No: Fax No:

HO Permit No:

Date: 22/05/17 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	1		X	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	1		X	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	1		X	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]				[illegible]
									[illegible]

Address to which trophies are to be sent:

Code: Country Trophy Export Date (Estimate)

Conservation Levy

Total:

Copies: Client Original White
1st Copy Pink
Hunting Outfitter 2nd Copy Blue
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

ORDINARY PERMIT

PERMIT NUMBER: O № 13541

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	
ADDRESS	
PROVINCE	

DETAILS OF PERMIT HOLDER

NAME	Robert Gerald	ID NO.	N/A
SURNAME	Shifflett	PASSPORT NO.	(b) (6)
	POSTAL ADDRESS	RESIDENTIAL ADDRESS	(b) (6)
ADDRESS			
ADDRESS			
ADDRESS			
TOWN			
POSTAL CODE			
PROVINCE			

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	RH Heuser
NAME AND SURNAME: RESPONSIBLE PERSON	RH Heuser
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	Kwalata Wilderness
PHYSICAL ADDRESS OF FACILITY	farm New Belgium 608 LR
DISTRICT	Lephalale
PROVINCE	Limpopo
REGISTERED NAME AND NUMBER (in the case of game farm)	N/A

DETAILS OF SPECIES INVOLVED

SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(if known)		(if applicable)
African Elephant	Loxodonta africana	Male	1 (one)	N/A

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Hunt Permit

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)	Robert Gerald Shifflett
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	RH Heuser
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	RH Heuser
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	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 04/08/2017	TO:	04/04/2017
RECEIPT NUMBER	1059 793 CR100-00		
SIGNATURE OF ISSUING OFFICER:		SIGNATURE OF PERMIT HOLDER:	x (b) (6)
DATE STAMP:	WILDLIFE TRADE AND REGULATION LEPHALALE SERVICE CENTRE WATERBERG DISTRICT 2017 -06- 04		(b) (6)

HUNTING SPECIAL CONDITIONS Permit no: 1354

1. This permit does not absolve the holder thereof in obtaining any other permit, licence, certificate or document as may be required by any other relevant legislation from any province or country.
2. This permit must be signed by the permit holder and must be in his/her possession for the duration of the hunt.
3. This permit does not allow the hunting with a bow and arrow or any other prohibited method unless specified on the permit.
4. This permit does not authorise the hunting during the night, unless specified on the permit
5. This permit does not allow the hunting of listed species which is under the influence of a tranquilising, narcotic, immobilising or similar agent,
6. If a wounded animal crosses into a neighbouring country, province or property the Department as well as the country where the animal entered into must be notified within 24 hours
7. No driving of listed species for the purpose of hunting is authorised.
8. The Department reserves the right to nominate an official to be present during any or all hunts conducted in accordance with this permit.
9. The outcome of the hunt in the case of TOPS threatened species must be reported within two working days after the listed species was hunted, the hunt terminated or in the case where the hunt was not successful. This office reserves the right to inspect the hunting sight or any relevant product of such hunt.
10. In the case where trophies will not be exported from RSA the permit holder must immediately apply for a TOPS Possession Permit in the case of TOPS species
11. Elephant tusks must be marked by an Environmental officer
12. A TOPS Ordinary permit is required to convey any part of any TOPS specie hunted to any facility within the country, except a taxidermy
13. The Department may require scientific information or material from the animal hunted.
14. The non-compliance with the permit details as well as these special conditions will result in criminal charges and may influence the granting of similar permits to the permit holder.
15. Issued in terms of the Limpopo Environmental Management Act 2003, Act no. 7 of 2003.
16. An elephant/ crocodile may not be hunted next to the water's edge of an international border
17. In the case of dangerous game the minimum calibre requirement is a 375.
18. This permit does not absolve the applicant from conforming to the norms and standards for hunting
19. No put and take system of hunting is allowed
20. No animal may be hunted in a controlled environment
21. The use of dogs may only be used to flush birds or track wounded animals
22. All non-residential clients must be accompanied by a PH.

RHINO

23. The Department must be informed 48 hours before the hunt takes place and a representative of the Department must be present during the hunt.
24. The horns may not be separated from the rest of the trophy.
25. The horns must be micro chipped on the property where the hunt took place, unless already micro chipped.

26. The PH register must be completed and signed immediately after the hunt.
27. The hunting permit and the copy of the PH register must accompany the trophy when being transported between destinations

LARGE PREDATORS

28. No large predator may be hunted if released in an area adjacent to a holding facility for large predators
29. May not be hunted by means of bait except in the case of leopard, lion and hyena where dead bait may be used
30. May not be lured by sound or any other induced luring method to be hunted
31. May not be hunted in an enclosure and in the case of lion of 1000 ha and release at least 7 days before the hunt.
32. The use of a spot light may only be used in the case of hunting leopard and hyena.

Permit Officer

2017/08/04
Date

(b) (6)

Permit Holder

2017/08/14
Date

WILDLIFE TRADE AND REGULATION
LEPHALALE SERVICE CENTRE
WATERBERG DISTRICT
2017 -08- 04
PO BOX 150 LEPHALALE 0555
TEL (014) 763 2886 FAX (014) 763 1733
LIMPOPO PROVINCE

PERMIT NUMBER O: 1354 /

STANDARD PERMIT CONDITIONS

1. This permit is not transferable.
2. Any unauthorised alteration to this permit shall render it invalid.
3. This permit is subject to the provisions of any applicable law in force during the period of validity of the permit.
4. This permit is valid only within the province where it was issued.
5. The holder of 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.
6. This permit shall be invalid until such time that it is signed by the permit holder.
7. This permit shall be deemed invalid when it is lost or destroyed and no copy thereof shall be such issued.
8. This permit may be withdrawn by an authorised person if the execution of any activity may be detrimental to the welfare of any wild animal or the safety of any person, provided that the permit holder is given notice of such intention and be granted the opportunity to appeal to such withdrawal.
9. The prescribed fees paid for the issuing of this permit shall not be refunded.
10. If the holder of this permit contravenes or fails to comply with any permit condition or requirement to which this permit is subject, he or she shall be guilty if an offence.
11. This permit shall be subject to any applicable norms and standards in existence at the time of issuance of this permit.

SPECIAL CONDITIONS

1. This issuing authority shall determine the species and restricted activities for which this permit will apply.
2. If this permit applies to hunting , the holder of this permit must:

    a. Have a copy of this permit authorising the hunt, on his or her person during the hunt;
    b. Within 21 days after the hunt, furnish the issuing authority with a written return on the hunt stating:
        (i) the permit number and date of issuance of the permit;
        (ii) the species, sex and number of animals hunted; and
        (iii) the location where the hunt took place.
    c. Return the original permit to the issuing authority forthwith after expiry of the permit.

To be completed by landowner after completion of the hunt:

Name and signature of landowner: R.H. Heuser (b) (6)

Species, number and sex of animals hunted: one male Elephant

Date/ Period of Hunt: 14 - 24 August 2017

WILDLIFE TRADE AND REGULATION
LIMPOPO PROVINCE
2017 -08- 04

Kwalata Wilderness (Pty) Ltd
Reg. Number: 2017/224863/07
Vat Number: 4530231937
P.O. Box 485
Vaalwater
0530
South Africa

Tel: +27 (0)14 755 4104
Fax: +27 (0)14 755 4249
E-mail: office@kwalata.com
Web: www.kwalata.com

PERMISSION TO HUNT

DATE: 22/08/2017

NAME AND ADDRESS OF LANDOWNER OF KWALATA WILDERNESS

REINHARD HEINZ HEUSER
BLINKWATER 604LR, LEPHALALE
ID NUMBER: 800716 5230 08 4
CONTACT NUMBER: 082 414 5622 OR 014 755 4104

I, Reinhard Heinz Heuser, manager of Kwalata Wilderness, hereby gives permission to:

ROBERT (b) (6) SHIFFLET

ID/Passport Number: (b) (6)

Contact Number:

Email Address:

To hunt on the above-mentioned farm(s) from 14/08/17 **to** 22/08/17

The following animals may be Hunted and Exported/Transported:

Amount	Species	Gender	Part of animal to be Exported/Transported
1	Blesbuck	Male	Skull, Cape & Bits
1	Genet	Male	Fullmount & Skull
1	Elephant	Male	Cape, Skull, Tusks, 4 Feet, 4 leg bones, tail, 3 Hide panels.

Signature of Manager

(b) (6)
Signature of Hunter

LIMPOPO

PROVINCIAL GOVERNMENT
REPUBLIC OF SOUTH AFRICA

LIMPOPO PROVINCE
2016 -08- 16
DEPARTMENT OF ECONOMIC DEVELOPMENT, ENVIRONMENT AND TOURISM
LEPHALALE SERVICE CENTRE
WATERBERG DISTRICT

DEPARTMENT OF
ECONOMIC DEVELOPMENT, ENVIRONMENT & TOURISM

P3-EXEMPTION PERMIT

(Issued in terms of the provisions of the Limpopo Environmental Management Act 2003, Act no.7 of 2003)
In terms of and subject to the provisions of the abovementioned legislation and the regulations framed thereunder. The holder of this permit is hereby authorized to hunt, catch or sell the species of wild animals specified in the table below on the property mentioned on this permit during the mentioned period of validity.

Permit Holder

Full Name:	Mr R.H Heuser	**ID No.:**	(b) (6)
Postal Address:	P.O Box 485	**Physical Address**	Blinkwater 604 LR
Postal Suburb:	Vaalwater	**Physical Suburb:**	Lephalale
Postal State:	Limpopo	**Physical State:**	Limpopo
Postal Country:	South Africa	**Physical Country**	South Africa
Postal Code:	0530	**Postal Code:**	0555

Permit Details

Permit No:	ZA/LP/WLE/0030	**Stamp :**	LEPHALALE SERVICE CENTRE ENVIRONMENTAL AFFAIRS LIMPOPO PROVINCE
Effective Date:	2016/08/16		
Valid Until:	2019/08/16		
Paid: (ZAR)	570.00		
Receipt No.:	1072 686		

Farm Name / Organization	District	Province	Country
Akkerlyt 632LR (see List)	Lephalale	Limpopo	South Africa

Species Name	Scientific Name	Quantity	Note
Blue Wildebeest	*Connochaetes taurinus*		Live
Buffalo	*Syncerus caffer*		Live
Bushbuck	*Tragelaphus scriptus*		Live
Common Duiker	*Sylvicapra grimmia*		Live
Eland	*Taurotragus oryx*		Live
Gemsbok	*Oryx gazella*		Live
Giraffe	*Giraffa camelopardalis*		Live
Hippopotamus	*Hippopotamus amphibius*		Live
Impala	*Aepyceros melampus*		Live
Klipspringer	*Oreotragus oreotragus*		Live
Kudu	*Tragelaphus strepsiceros*		Live
Mountain Reedbuck	*Redunca fulvorufula*		Live
Nyala	*Tragelaphus angasii*		Live
Red Hartebeest	*Alcelaphus buselaphus caama*		Live
Sable Antelope	*Hippotragus niger niger*		Live
Springbuck	*Antidorcas marsupialis*		Live
Steenbok	*Raphicerus campestris*		Live
Waterbuck	*Kobus ellipsiprymnus*		Live
Zebra Burchells	[redacted]		Live

Form 3-200-19

OMB Control No. 1018-0093
Expires 08/31/2020

Rcvd 4-9-18

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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Senrud	Nick	A.	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Spring Creek	Nevada	89815	Elko	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)

(b) (6) [redacted] 04/03/2018

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)?

Cherish Senrud
(b) (6)
[redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. 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 tusks

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: _[redacted] 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 RHINOCERUS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

Specified officer's signature and date-stamp

Cert. No 107587

Name NICK ANTHONY SENGUD

(b) (6) [redacted]

Address PARKWAY SPRING CREEK NEMBA, USA

Tusk serial number ZW20142076

Tusk mass (kg) 13CGS

Tusk length (metric) 133CM

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)

Specified officer's signature and date-stamp

Cert. No 107588

Name NICK ANTHONY SENGUD

(b) (6) [redacted]

Address PARKWAY SPRING CREEK, NEMBA, USA

Tusk serial number ZW20142105

Tusk mass (kg) 16KGS

Tusk length (metric) 142CM

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)	**Client's Full Name**	NICK ANTHONY SENRUD
ZTA (HOP) No.	HOP0000	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	P O Box CY140, Causeway, HARARE	**Address**	(b) (6)
Name of Professional Hunter	WARREN THORN	**Licence No.**	494
Telephone		**Fax**	10

Number of Accompanying Guests	10
Are the trophies being exported after tanning and mounting?	No
Are the trophies being exported after primary treatment?	Yes

Name of Processing Agent or Taxidermist	CHIPITANI SAFARI COMPANY P/L	**Address**	8 RIVONIA ROAD MOUNT PLEASANT HARARE
Name of Shipping Agent		**Address**	
Name of Foreign Agent		**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								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
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 _____

RCVD SEP 11 2018

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Bowman	William	R	Jr.

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 (include if different than mailing address; include Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Dandridge	Tennessee	37725	Jefferson	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature(s) 8-29-18 Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as Page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Same as Page 1 (myself)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

LOXODONTA 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:

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:

Already Hunted

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Maseke Game Reserve, Archie 156 KT, Phalaborwa, South Africa

b. Date wildlife was hunted:

1 June thru 8 June 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Fritz Rabe
Fritz Rabe Adventures
HO #ZA/LP/87383

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Trophy Solutions Taxidermy
PO Box 12043 Bendor
Polokwane, South Africa 0713

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:	
Business Name:	Trophy Solutions Taxidermy
Address:	PO Box 12043 Bendor Park
City:	Polokwane, South Africa 0713
State/Province:	Customs Code: 20302458
Country, Postal Code:	State Vet Registration Code: ZA 8/117
	info@trophy-care.com Phone: +27 15 880 0888

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Attached

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Attached

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Attached

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b) (6) Date: 8-29-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Attachments

Responses to para 9

South African Hunting Permit for Export

Photos of Meat Distribution from hunted Elephant

9.

a. According to CITES, elephant populations are on the rise in South Africa with an annual growth rate of approximately 5%. Additionally, the CITES report states that "Elephant populations in South Africa's protected areas (this hunt occurred in one of these areas) are under no major threat and statistics show that poaching in South Africa is well under control." This hunt occurred on the Maseke Game Reserve which is approximately 35,000 acres. The reserve is part of the Associated Private Nature Reserves (APNR) collective which are land holdings adjacent and open to Kruger National Park. Collectively they represent 450,000 acres of land dedicated to conservation. These protected reserves utilize a combination of eco-tourism and hunting to financially support the reserve and to maintain animal populations at a number compatible with available food sources. Game counts are measured against browse/grazing requirements for each species and a suitable hunting quota is allocated annually. An estimated population of 400 plus elephant reside on the Maseke reserve and those numbers are increasing annually. At the current population numbers, five to seven elephant are allocated for hunting each year. As the populations increase those numbers may rise. These hunts are fully authorized by the APNR and fully sanctioned by CITES. All required legal paperwork must be submitted and all required permits must be issued prior to the hunt taking place. (See our attached permit authorizing this hunt).

b. The trophy fee paid for this hunt was distributed as follows:

* R 5000 to South African Nature Conservation Department.

* R 10,000 to processing, bagging, freezing, and distribution of this elephant meat to the local Drop In Center of 235 orphans and needy children.

* R 100,000 to Balule Nature Reserve Ecological monitoring and Anti-Poaching budget.

* R 222,222 to supporting the local community that owns the land.

* The balance goes to managing the reserve itself for road maintenance, paying game rangers, internal anti-poaching untis, pumping water to established waterholes on the reserve, fence repair, etc. The reserve has 5.4% of the western boundary of the Kruger National Park and must repair and maintain all boundary fences to mitigate elephant/human conflicts.

c. Conservation benefit to elephant is realized in the establishment and maintaining of these reserves which provide a natural habitat and environment in which they may live. Waterholes are built and pumped throughout the reserve which not only benefits elephant but all species of wildlife residing there. Anti-poaching units are trained and deployed upon these reserves to police poaching activities and species population growth is maintained through sustainable use conservation efforts (hunting) to ensure ample food remains available for all species within the reserve.

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

DEPARTMENT OF ENVIRONMENTAL AFFAIRS
PERMIT NUMBER: 0 № 10299
WASTE & SERVICE CENTRE
NAME P.O. BOX 1408
ADDRESS HOEDSPRUIT
1380
LIMPOPO PROVINCE
PROVINCE

DETAILS OF PERMIT HOLDER			
NAME	W.R	ID NO.	(b) (6)
SURNAME	Bowman JR	PASSPORT NO.	
	POSTAL ADDRESS	RESIDENTIAL ADDRESS	
ADDRESS			
ADDRESS			
ADDRESS			
TOWN			
POSTAL CODE			
PROVINCE			

(b) (6)

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	S. Nielsen
NAME AND SURNAME: RESPONSIBLE PERSON	S. Nielsen
NAME AND SURNAME OF AGENT	-
PHYSICAL ADDRESS OF FACILITY	Mashoba (Pvt) Ltd
PHYSICAL ADDRESS OF FACILITY	Beitbridge
DISTRICT	Matabeleland South
PROVINCE	Zimbabwe
REGISTERED NAME AND NUMBER (in the case of game farm)	-

DETAILS OF SPECIES INVOLVED				
SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(if known)		(if applicable)
Elephant	L. africana	Male	one	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED
Hunt an Elephant in Mashoba (Pvt) Ltd

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)	W.R Bowman JR
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	F.J.J Potgieter
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	F.J.J Potgieter
WEAPON AND METHOD OF HUNTING	rifle with 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: 22/05/2018	TO:	22/06/2018
RECEIPT NUMBER	FC 108365		
SIGNATURE OF ISSUING OFFICER:		SIGNATURE OF PERMIT HOLDER:	(b) (6)
DATE STAMP:	22 MAY 2018 P.O. BOX 1408 HOEDSPRUIT 1380 TEL: 015 793 2471 FAX: 015 793 2572 LIMPOPO PROVINCE		

HUNTING SPECIAL CONDITIONS- APNR

1. This permit does not absolve the holder thereof in obtaining any other permit, licence, certificate or document as may be required by any other relevant legislation from any province or country.
2. This permit must be signed by the permit holder and must be in his/her possession for the duration of the hunt.
3. This permit does not allow the hunting with a bow and arrow or any other prohibited method unless specified on the permit.
4. This permit does not authorise the hunting during the night, unless specified on the permit
5. This permit does not allow the hunting of listed species which is under the influence of a tranquilising, narcotic, immobilising or similar agent,
6. If a wounded animal crosses into a neighbouring country, province or property the Department as well as the country where the animal entered into must be notified within 24 hours
7. No driving of listed species for the purpose of hunting is authorised.
8. The Department reserves the right to nominate an official to be present during any or all hunts conducted in accordance with this permit.
9. The outcome of the hunt in the case of TOPS threatened species must be reported within two working days after the listed species was hunted, the hunt terminated or in the case where the hunt was not successful. This office reserves the right to inspect the hunting sight or any relevant product of such hunt.
10. In the case where trophies will not be exported from RSA the permit holder must immediately apply for a TOPS Possession Permit in the case of TOPS species
11. Elephant tusks must be marked by an Environmental officer
12. A TOPS Ordinary permit is required to convey any part of any TOPS specie hunted to any facility within the country, except a taxidermy
13. The Department may require scientific information or material from the animal hunted.
14. The non-compliance with the permit details as well as these special conditions will result in criminal charges and may influence the granting of similar permits to the permit holder.
15. Issued in terms of the Limpopo Environmental Management Act 2003, Act no. 7 of 2003.
16. An elephant/ crocodile may not be hunted next to the waters edge of an international border
17. In the case of dangerous game the minimum calibre requirement is a 375.
18. This permit does not absolve the applicant from conforming to the norms and standards for hunting
19. No put and take system of hunting is allowed
20. No animal may be hunted in a controlled environment
21. The use of dogs may only be used to flush birds or track wounded animals
22. All international clients must be accompanied by a PH
23. In the case of RSA clients , trophies or derivatives may not be sold, donated or exported from the borders of RSA
24. The hunt must take place within the requirements as set out in the hunting protocols for the APNR
25. The Department reserves the right to monitor or attend any hunt within the APNR

RHINO

26. The Department must be informed 48 hours before the hunt takes place and a representative of the Department must be present during the hunt.
27. The horns may not be separated from the rest of the trophy.
28. The horns must be microchipped on the property where the hunt took place, unless already microchipped.
29. The PH register must be completed and signed immediately after the hunt.
30. The hunting permit and the copy of the PH register must accompany the trophy when being transported between destinations

LARGE PREDATORS

31. No large predator may be hunted if released in an area adjacent to a holding facility for large predators
32. May not be hunted by means of bait except in the case of leopard and hyena where dead bait may be used
33. May not be lured by sound or any other induced luring method to be hunted
34. May not be hunted in an enclosure and in the case of lion of 1000 ha and release at least 24 hours before the hunt
35. The use of a spot light may only be used in the case of hunting leopard and hyena.

Permit Officer

22/5/18

Date

ENVIRONMENTAL AFFAIRS
KLASERIE SERVICE CENTRE
22 MAY 2018
P.O. BOX 1408 HOEDSPRUIT 1380
TEL: 015 793 2471 FAX: 015 793 2572
LIMPOPO PROVINCE

Distribution of this elephant meat to local community drop point for orphans and children

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD SEP 12 2018

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

RCVD SEP 12 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Taunton	Oscar	David	Jr

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
			(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Argyle	Texas	76226	Denton	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions (50 CFR 13.11(d)).
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signat (b) (6) [redacted] stamped signatures) Date of signature (mm/dd/yyyy) 09/03/2018

ntinue 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)?

David Taunton (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Loxodonta Africana, 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:

South Africa, Mpumalanga, Hoedspruit,Timbavati Private Nature Reserve
GIS -24.3879921 31.3372014

b. Date wildlife was hunted:

May 6, 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Madubula Safaris Pty Ltd, John Abraham

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 Street, 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:	Cecil Cunningham
Business Name:	Life Form Taxidermy
Address:	7 Aluminium Street
City:	White River, Mapumalanga
State/Province:	South Africa, 1240
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?

License fees were paid directly to MTPA (Mpumalanga Game Department) by the Outfitter. Trophy fees were paid to the Reserve by the Outfitter, these fees were used to fund the AntiPoaching Unit and Anti Poaching efforts in the area. Part of the trophy fees were also utilized for conservation of the remaining population. These include active patrols in the area, maintaining of access roads, perimeter roads, suitable watering points and payment of salaries. The TPNR (Timbavati Private Nature Reserve) has a scientific approved management plan in place for elephants and is strictly controlled by the Kruger National (Park hunting protocol

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 is also the Professional Hunter and has been actively involved in the conservation not only of Elephant but also of other species for the past 27 years. He has a track record of funding conservation and anti poaching efforts in the Province on a number of reserves including the Venetia Limpopo Nature Reserve, Klaserie Private Nature Reserve and Timbavati Private Nature Reserve.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: [redacted] Date: 09/03/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Permit No: 13695

Mpumalanga
TOURISM AND PARKS AGENCY

PERMIT FOR THE HUNTING OF

(Issued in terms of the Provisions of the Nature Conservation Act, 1998)

MPUMALANGA TOURISM & PARKS AGENCY
PROFESSIONAL HUNTING
Date Stamp
2017 -04- 18
PRIVATE BAG X 11338
NELSPRUIT 1200

☆ [x] SPECIALLY PROTECTED GAME
☆ [ ] PROTECTED GAME
☆ [ ] ORDINARY GAME DURING A PERIOD WHICH IS *NOT AN OPEN SEASON*
☆ [x] PROTECTED WILD ANIMALS
☆ [x] GAME IN A NATURE RESERVE

☆ *Mark the square as indicated in the authorisation of the Chief Executive Officer.*

Full name OSCAR DAVID TAUNTON (b) (6) [redacted]

and residential address of the holder of the permit (b) (6) [redacted] TEXAS, 76226, USA.

Name of the owner of the land to be hunted on PAUL WHITE

(MO/PM - JOHN ABRAHAM)

PARTICULARS OF THE HUNT

Name of farm or nature reserve and district in which it is situated	Species, number and sex of game which may be hunted	Species, number and sex of game hunted and the time and date on which it was hunted
TIMBAVATI PNR	ONE (1) ECCPTANT BULL	
MOCDSCRUT	ONE (1) BUFFALO BULL	

TO BE HUNTED IN ACCORDANCE WITH THE APNR HUNTING PROTOCOL AND APPROVED QUOTA

In terms of and subject to the provisions of the Nature Conservation Act 10 of 1998, the holder of the permit is hereby authorised to hunt the species, number and sex of the game referred to in the second column of the particulars of the hunt on the farm or nature reserve referred to in the first column thereof during the period of validity of the permit, subject to the conditions of the permit.

PERIOD OF VALIDITY OF THE PERMIT

The permit shall be valid for the period 04/05/ 2017

to 15/05/ 2017

VEEARTSNYPERMIT WORD OOK BENODIG:
VIR VERVOER VAN LEWENDE WILD EN RUI
VLEIS OF PRODUKTE.
VETERINARY PERMIT IS ALSO REQUIRED:
FOR TRANSPORT OF LIVE GAME AND RAW
MEAT OR PRODUCTS.

Number and date of the authorisation of the Chief Executive Officer .....

Permit/licence Fees:

Received R 6000.00 + R100 ADMIN FEE Receipt No E/17

Signature of the person authorised by the Chief Executive Officer to issue the permit. .....

TO BE FORWARDED TO:
WILDLIFE PROTECTION SERVICES
Private Bag X11338, Nelspruit, 1200 • Tel +27 (0)13 759 6300/1 • Fax +27 (0)13 759 6490

SEE CONDITIONS & REQUIREMENTS ON REVERSE SIDE

Printed by White River Printers 013 751 2478

RCVD SEP 14 201

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
HESSLER	DAVID	JOHN	

(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1. (b) (6) [redacted] nt #, Suite #, or Room #; no P.O. Boxes)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
WESTLAKE	OHIO	44145	CUYAHOGA	U.S.A.
2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurat(b) (6) [redacted] hat any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

08/02/2018

Signature of app[redacted] or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   David J. Hessler, (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

[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. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Loxodonta africana 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:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

      Namibia, Mashi Conservancy, Katima Mulilo

   b. Date wildlife was hunted: November 9, 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Omujeve Safaris / Gideon Cloete

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

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). SEE ATTACHED PERMIT NO. 175919

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: Gideon Cloete
Business Name: Omujeve Safaris
Address: Ongombo West Section 2 / Number 56
City: Windhoek
State/Province: Namibia
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

SEE ATTACHED STATEMENT: Namibia Elephant Fact Sheet - 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, local community, or government?

Approximately $55,000. Over half of the funds are reinvested into the community area to employ anti-poaching units, arm/train anti-poaching units, provide employment to locals and establish water points for the surrounding wildlife to utilize.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

The funds go to the people of the Mashi Conservancy to provide income and support the financial needs of the conservancy. The conservancy working with the outfitter established work programs/employment to over 25 people, who otherwise would have very little opportunity. These opportunities allow for people to earn a living working in the safari industry vs. turn to poaching and illegal hunting of all species, including elephants, for revenue.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: (b) (6) _____ Date: 9-7-2018

    David J. Hessler

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

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.:		175919
VALID FROM:		01/11/2017
VALID TO:		15/11/2017
RECEIPT No.:		Q2170775

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: David. J. Hessler

Residential Address: .....

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number	
	Buffalo		
I	Crocodile		
	Dik-dik		
	Eland		
* II	Elephant	1x	
	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	
	Steenbok		
	Warthog		
	Waterbuck		
	Wildebeest, blue		
	Zebra, Burchell's		
II	Zebra, Hartman's mountain		
	Blesbok		
	Wildebeest, black		
I	Cheetah		
I	Leopard		
II	Lion		
	Other		
*	Please report back within 48 hours after being Shoot.		

on the following farms / hunting concessions: Mashi Conservancy

.....

Guided by (name of guides): G. Cloete

.....

MINISTRY OF ENVIRONMENT & TOURISM
Elvis Markel E. Mbel
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

Official MET date stamp

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
2017 -10- 31
WINDHOEK PERMIT OFFICE
Private Bag 13306, Windhoek
Tel: 2842111 Fax: 258861

typoprint 2931/1 • Tel: 061 228777

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
2017 09-11	ELEPHANT - skin, skull, feet, Tusks							35±	MALE	MASHI Conservancy		[illegible]	(9) (a) [redacted]	[signature]

*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 hunding 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.

Namibia Elephant Fact sheet- 2018

Namibia's total elephant population has increased from an estimated 7500 in 1995 to 22711 in 2017 based on Namibian Ministry of Environment and Tourism study. This represents a 5.1% increase in population each year. It is important to note that these numbers include the impact of both legal and illegal offtakes. Namibia cannot support more elephants than its current numbers meaning the relocation to neighboring countries and offtake must offset exiting growth estimates. 2017 legal offtake numbers were 175 which still allowed for increase in total numbers of over 1400 if the 5.1% average increase was maintained. Relocation to neighboring countries is revenue negative and must be funded. If legal offtake at current rates is increased, significant funding could be used to provide relocation services and prevent overpopulation which degrades habitat for all wildlife and is not sustainable. Total relocation and offtake numbers should be in the area of 1000 elephants per year to maintain current population levels. If a conservative legal offtake of 250 elephants is used, the estimated increase in conservancies is US$ 1,937,460.

Villavicencio, Jorge <jorge_villavicencio@fws.gov>

08070D

1 message

Villavicencio, Jorge <jorge_villavicencio@fws.gov>
To: (b) (6) [redacted]

Mon, Jul 22, 2019 at 12:21 PM

Dear Mr. Hessler:

Your application was received September 14, 2018, and is currently being reviewed.

As background, on March 1, 2018, in response to a D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by-application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We will review each application received for import of sport-hunted trophies and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized.

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 priviledged, 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.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD SEP 18 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix

2. Date of Birth (mm/dd/yyyy)	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)	
For Legends Taxidermy Studios: (Miguel Mauricio Facusse Saenz)		Legends Taxidermy Stu	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
45-1554746		Taxidermy Studio	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
Flewelling	Harry	J.	
5. Principal officer title		6. Primary contact name	
President		Amy Wicklund	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
(231) 757-9589	n/a	(231) 757-9735	info@legendstaxidermy.c

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
5089 N US Highway 31				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Scottville	Michigan	49454	Mason	USA
2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Harry J Flewelling — 09/11/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   N/A

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Amy Wicklund Phone: (b) (6) Email: info@legendstaxidermy.com

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

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). unknown

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

N/A

b. Date wildlife is to be hunted:

N/A

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

N/A

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Hunting Area: Sango Ranch-Save Valley Conservancy, Bikita, Masvingo, Zimbabwe. Nearest city is Masvingo.

b. Date wildlife was hunted:

August 25th 2017 through September 8th, 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Zambezi 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 foreign export/re-export document]:

Trophy Consultants International 4 Josiah Chinamano Road Belmont Bulawayo Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). see attached copies

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Trophy Consultants International
Address:	Trophy Consultants International 4 Josiah Chinamano Road
City:	Belmont
State/Province:	Bulawayo
Country, Postal Code:	Zimbabwe

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

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, local community, or government?

Please see attached

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please see attached

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: Hans J Thumlert Date: 9/11/18

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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SPECIAL POWER OF ATTORNEY

I, the undersigned **MIGUEL** (b) (6) **SAENZ**, passport number (b) (6) residing in (b) (6) ; hereby authorize **LEGENDS TAXIDERMY STUDIOS** to submit on my behalf the Federal Fish and Wildlife Permit Application Form # 3-22-20 for my Elephant.

This document shall be construed and interpreted as a limited and special power of attorney which is valid only for the purposes and entity stated herein and may not be uses for any other transaction or by any person not named.

Executed this September 11, 2018, at (b) (6)

Signature (b) (6)

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)

0000079458
HUNT_FUNDS_CAPTURED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Zambezi Hunters	Client's Full Name	Miguel (b) (6) Saenz
ZTA (HOP) No.	HOP0212	Passport Number	(b) (6)
		Country of Issue	(b) (6)
Address	2 Peckham Road, Newlands, PO Box BW1330 Borrowdale, Harare janna@zambezihunters.com	Address	(b) (6)
Name of Professional Hunter	THIERRY LABAT	Licence No.	187
Telephone		Fax	NIL
Number of Accompanying Guests		2	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	Maple freight	Address	4th Josiah Chinamano Road Belmont Bulawayo Zimbabwe
Name of Foreign Agent	Safari Marketing Company	Address	5355 Northland Drive, Suite C104, Grand Rapids, MI 49525

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Sango	Masvingo	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	10-08-2017
Date of Safari To	26-08-2017
Daily Rate Charged For Big Game USD	1,660.00
Daily Rate Charged For Plains Game USD	00
Daily Rate Charged for Non hunting guests USD	290.00
Number of Accompanying Guests	2

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	08-JUN-2017	DMS/937	26-SEP-2017	USD	74,255	74,255
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	29 880 00	Total Guests rate	6,380.00
Less Commission	00	Total Trophy fees	35,500 00
Other fees (Incidentals)	2 495 00	Grand Total USD	74 255 00
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	ELEPHANT - WITH TUSKS	M	Killed	Sango	254458	17-AUG-2017	120lbs	19,500
2	ELAND	M	Killed	Sango	094573	15-AUG-2017	88	1,750
3	LEOPARD	M	Killed	Sango	278579	13-AUG-2017	16 10/16	7,500
4	BUFFALO	M	Killed	Sango	276542	19-AUG-2017	96	5,000
5	ZEBRA	M	Killed	Sango	033575	10-AUG-2017		500
6	ZEBRA	M	Killed	Sango	033575	10-AUG-2017		500
7	IMPALA	M	Killed	Sango	055534	11-AUG-2017	51	250
8	IMPALA	M	Killed	Sango	264583	11-AUG-2017		250
9	IMPALA	M	Killed	Sango	211602	11-AUG-2017		250
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
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22								
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28								
29								
30								

Please see below.

9(a) Sango Ranch is a member of the larger Save Valley Conservancy in south eastern Zimbabwe which covers an area of over 650,000 acres (of which Sango is 160,000 acres) with no internal fencing so the elephant and other wildlife are free to roam the extent of the conservancy. The Save Conservancy developed an elephant Management Policy in 2007 with USFWS funding and since then has seen the elephant population steadily increasing from an estimated 1018 (2007) to just under 2000 (2017). Chart below is up to 2013 when, due to the reduced income for properties from permit issues, full SVC aerial surveys were stopped.

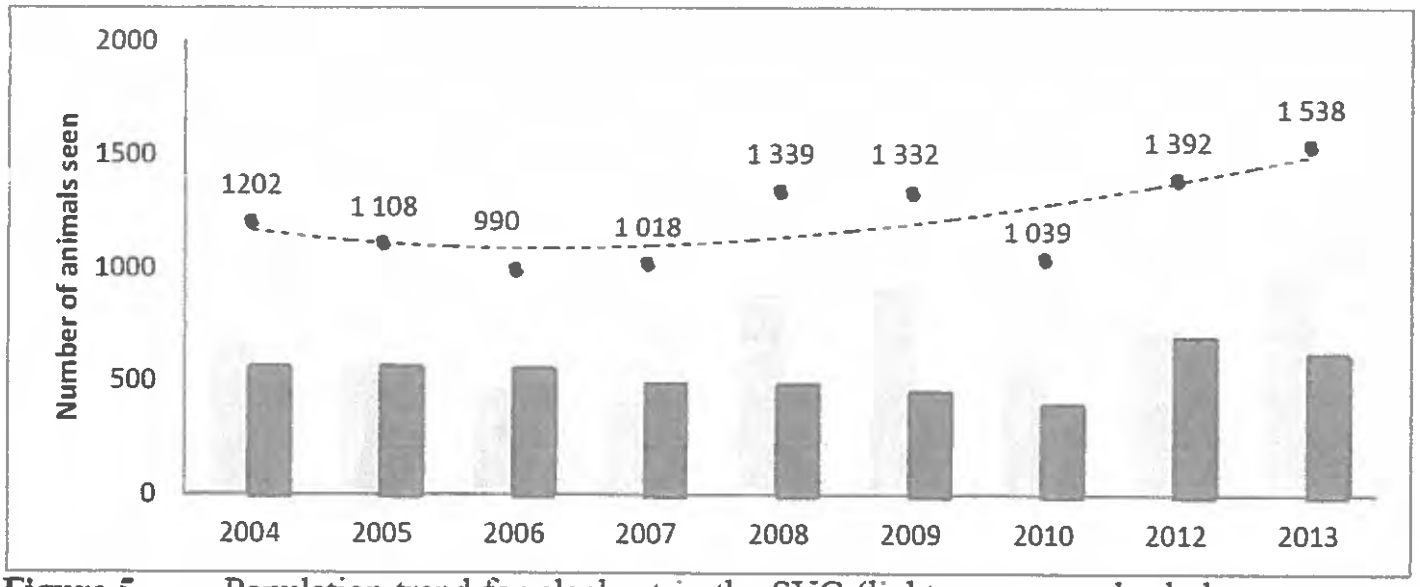


Figure 5 Population trend for elephant in the SVC (light-grey – north: dark-grey – south).

9b The fee paid by client to shoot the elephant is USD19,500.00 and was used to cover the conservation costs of managing Sango Ranch. The income does not cover full costs of running the property and the owner has to supplement.

9c The owner of Sango Ranch supplements the ranch income with a further US$300,000 – 400,000 annually to ensure effective management of the wildlife populations. The Save Conservancy has a population of over 100 black rhino of which over 50% occur on Sango at any one time. This requires high levels of security to ensure adequate protection which benefits all other populations including elephant. There is currently an estimated over abundance of elephant in the SVC and there is a permit for the live sale of 120 elephant to be removed from Sango ranch to be taken to the Zambezi Valley.

Hope this will help.

Kind regards,

PRECIOUS PACHITI
ADMINISTRATION & LOGISTICS

ZAMBEZI HUNTERS
BIG GAME HUNTING SAFARIS

+263 0776 013 903
2 PECKHAM RD, NEWLANDS, HARARE
PRECIOUS@ZAMBEZIHUNTERS.COM
WWW.ZAMBEZIHUNTERS.COM

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No. 1018-0093
Expires 05/31/2017

LB

RCVD SEP 25 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.

A.	**Complete if applying as an individual**		
1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Givhan	Bryan	Steven	

(b) (6) [redacted]

B.	**Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution**		
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C.	**All applicants complete address information**			
(b) (6) [redacted] ; no P.O. Boxes)				
1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Tuscaloosa	AL	35406	Tuscaloosa	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
				USA

D.	**All applicants MUST complete**
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))
2.	Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒
3.	Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts*** (b) (6) [redacted] at the information submitted in this application for a permit is complete and accurate to the best of my kn rein may subject me to the criminal penalties of 18 U.S.C. 1001. Signature (in ink) otocopied or stamped signatures) Date of signature (mm/dd/yyyy) 9/14/2018

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: _____ (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:
   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, Caprivi, Omujeve Safaris region
   b. Date wildlife was hunted: August 18, 2018

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): Tusks and back 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]:

Omujeve Safari
POBox 9453
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: Corne Kruger
Business Name: Omujeve Safari
Address:
Address: POBox 9453
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 (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 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).

Coppersmith Global logistics
114 Southfield Parkway Suite 170
Forest Park, GA 30297

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):

Bryan Gorhan
(b) (6)
Tuscaloosa AL 35406 (Envelope included for mailing permit)

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):

Bryan Gorhan
(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 is a list of how Trophy Elephant hunting in Nambia helps to preserve the Elephant population.

1. A significant part of the trophy fee goes directly to elephant conservation
2. Preservation of elephant herds require vast amounts of land to provide adequate forage. Hunting concessions allows for large expanses of land that is mostly uninhabited, is not farmed and no cattle grazing.

3 Trophy Elephant hunting only allows for the taking of old bulls who are usually on their last set of teeth and would be faced with starvation within 10 years. Allowing a value to be placed on the older bulls provides for herd protection from poaching as the Hunting concession actively seeks the help of the local people to prevent poaching.

4. Hunting concessions provide much needed meat to the local tribal people.
5. Hunting concessions provide jobs for local tribal people By adding value to an animal the local people view as destructive and harmful to their tribe, the elephant is then protected from poisoning.
6. Careful monitoring of the. Elephant herds by Hunting concessions along with the Government game scout provides for accurate numbers to control over hunting.

7 The Hunting outfitter is a native Namibian who resides in Namibia so all profits are kept in Namibia and add to the Namibian economy and therefore supports stability of the area elephants inhabit

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

SEP 2 7 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
GALLMANN	KAREN		

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			matt@genuslogistics.com

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ANGELICA	NY	14709		US
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

7/12/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   GENUS LOGISTICS 161-15 ROCKAWAY BLVD ST 205 JAMAICA NY 11434 SASE INCL FEDEX / MATT MAYERS

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   MATT MAYERS 718 790 0216 MATT@GENUSLOGISTICS.COM

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

SOUTH AFRICA, FARM BLINKWATER

b. Date wildlife was hunted:

10/21/2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

MPC BARNBERGER
PO BOX 286
LEPHALALE SOUTH AFRICA 1555

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

MPC BARNBERGER / WARTHOG SAFARIS
PO BOX 286
LEPHALALE SOUTH AFRICA 0555

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). PH REGISTER,

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	MPC BARNBERGER WARTHOG SAFARIS
Address:	PO BOX 286
City:	LEPHALALE
State/Province:	
Country, Postal Code:	SOUTH AFRICA 0555

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: _____ Date: _____

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 66306

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 21 / 10 / 2017 Terminated 30 / 10 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
			X					

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: MPC Bamberger
Business Address: P O Box 286
Lephalale
Code: 0555
ID No: 761108 5007 083
PH Permit No: 2A/LP/84191
Date: 2017/10/31 Signature:

[redacted]

(b) (6)

HUNTING OUTFITTER

Name: MPC Bamberger
Business Address: PO Box 286
Lephalale Code: 0555
I.D. No: 761108 5007 083
Tel No: 082 426 5585 Fax No: 086 531 7308
HO Permit No: 2A/LP/84190
Date: 2017/10/31 Signature:

Farm Name / Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Permit Trophy to be sported
Farm Blinkwater 604 LR	Lephalale	RH Heyser	05598	21/10	African Elephant	1		X	Scull, Tusks, Skins
				23/10					

Address to which trophies are to be sent:
Code: Country: Trophy Export Date (Estimate):

Conservation Levy
Total

Copies: Client Original White
1st Copy Pink
Hunting Outfitter 2nd Copy Blue
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.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a Permit to Import a threatened-listed ELEPHANT Trophy from SOUTH AFRICA.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservationforce.org

(b) (6) [redacted]

SIGNATURE

KAREN M. GALLMANN

KAREN GALLMANN

6/19/20

DATE

[EXTERNAL] Notice of Representation for Permit #'s 70352D , 09915D and 09916D

Aimee Korver <permits@conservationforce.org>

Wed 6/24/2020 12:48 PM

To: Nelson, Emma G <emma_nelson@fws.gov>; John Jackson, III <jjjiii@att.net>

3 attachments (1 MB)

NOTI Rep-signed.pdf; Notice of Representation 1.jpeg; Notice of Representation 2.jpeg;

Ms. Nelson,

Please find the attached Notices of Representation for applicants, Karen Gallmann and Brett Parker.

Ms Gallmann has import permit applications for a lion and an elephant from South Africa.

Mr. Parker has an import permit application for a lion from South Africa.

Please let me know that you have received these documents and if you have any questions.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

RCVD SEP 26 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S address may be required in Section C, see instructions for details
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1 a Last Name	1 b First Name	1 c Middle Name/Initial	1 d Suffix
Kesteloot	James	Arthur	

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

(b) (6)

1 b City	1 c State	1 d Zip code/Postal code	1 e County/Province	1 f Country
Holly	Michigan	4844 2	Oakland	USA

2 a Mailing address (include if different than physical address, include name of contact person if applicable)				
2 b City	2 c State	2 d Zip code/Postal code	2 e County/Province	2 f Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U S FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13 11(d)]

2. Certification I hereby certify that I have read and am familiar with the regulations contained in *Title 50 Part 13 of the Code of Federal Regulations* and the other *applicable parts in subchapter B of Chapter I of Title 50*, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief I understand that any false statement herein may subject me to the criminal penalties of 18 U S.C 1001

(b) (6)

copied or stamped signatures) Date of signature (mm/dd/yyyy)

09/20/2018

ease continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

James A. Kesteloot
(b) (6)
[redacted]

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Jim Kesteloot
(b) (6)
[redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

[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. 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 - Zambezi Region
   Caprivi Strip
   Sobbe Conservancy
   Nearest City :Katima Mulilo, Namibia

   Sobbe
   Conservancy
   S17 56.061 • E023 44.125

   b. Date wildlife was hunted:

   April 30, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Ndumo HuntingSafaris - Owner Karl Stumfe
Professional Hunter - Fred Bezuidenhout
+264 811 285 416

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]:

Pronto Air & Ocean Freight
PO Box 11388, Klein Windhoek / B1 Hwy North, Plot 42, Brakewater Windhoek
Peter de Villars - +264 614 02993 - +264 81657 4666

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). License Attached - # 177996

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Peter de Villars
Business Name: Pronto Air & Ocean Freight
Address: PO Box 11388, Klein Windhoek / B1 Hwy North, Plot 42, Brakewater Windhoek
City: 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?

Population is Stable to a 6% increase in the
population.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

$20,000.00 in trophy fees to the Sobbe Conservancy

$ 5,000.00 to the Anti-Poaching Team

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

-15 Sobbe Conservancy Jobs were created and are employed as a result of my Safari.
-100 % of the Meat was donated to the Sobbe Conservancy Community.
this feeds the whole Sobbe village and gives them much needed protein.
-$5,000.00 went to the Anti-Poaching team.
This helps fund the costs of transportation, Food, and necessary equipment to support the
much needed Anti-Poaching Teams

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 for the import of a leopard trophy, I understand that I may only import two l

(b) (6)

Applicant's signatu _____ Date: 9/20/2018

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.

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).

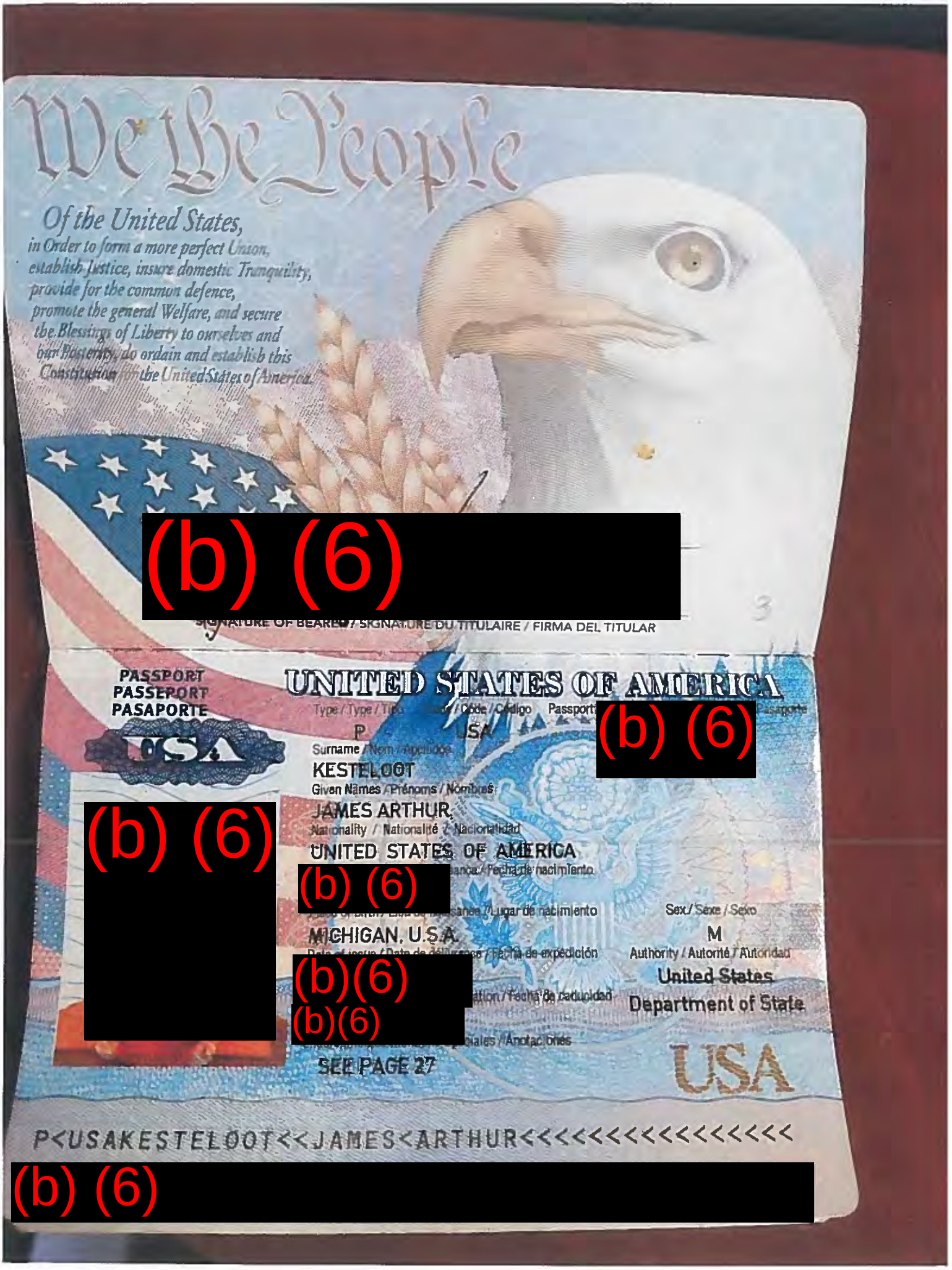
James A. Kesteloot

(b) (6) [redacted]

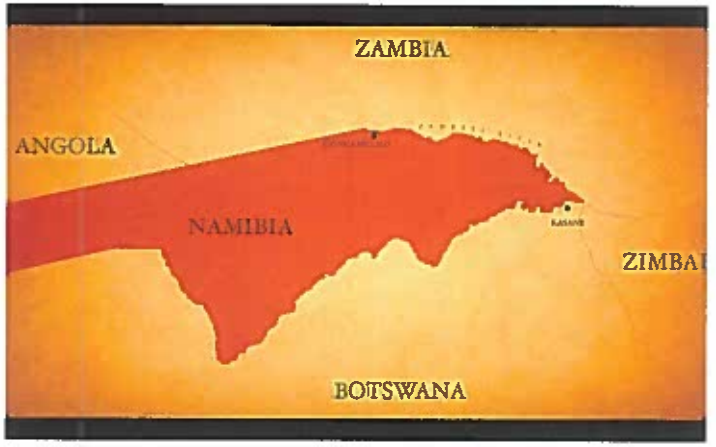
Holly, MI 48442

(b) (6) [redacted]

Elephant CITES


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.
(b) (6)
SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR
PASSPORT
PASSEPORT
PASAPORTE
USA
UNITED STATES OF AMERICA
Type / Type / Tipo
P
Code / Código
USA
Passport
(b) (6)
Surname / Nom / Apellidos
KESTELOOT
Given Names / Prénoms / Nombres
JAMES ARTHUR
Nationality / Nationalité / Nacionalidad
UNITED STATES OF AMERICA
(b) (6)
(b) (6)
MICHIGAN, U.S.A.
Sex / Sexe / Sexo
M
Authority / Autorité / Autoridad
United States
Department of State
(b)(6)
(b)(6)
SEE PAGE 27
USA
P<USAKESTELOOT<<JAMES<ARTHUR<<<<<<<<<<<<<<<<
(b) (6)

James A. Kesteloot
Caprivi Safari



James A. Kesteloot
Caprivi Safari

One of the Villages in the Sobbe Conservancy

James A. Kesteloot
Caprivi Safari

One of the Villages in the Sobbe Conservancy.
Every morning would start with a visit to the village to see if the "problem" Elephant had come in the night.

The older Male Elephants destroy the Village crops, forcing the villagers to build fires and post guards to try and keep the problem elephants out.

James A. Kesteloot
Caprivi Safari

The local Village Farmers would try different methods to try and keep the elephants out of their crops.
This picture shows how they use wire with pop cans to make noise hoping to scare the elephants out. The noise also lets the farmers know the elephants were back.

In many cases the villagers would shoot at the problem elephants with 00 buck shot to try and scare them off.
Sometime this would work, however the elephants come back in a few days or a few hours.

James A. Kesteloot
Caprivi Safari

Professional Sobbe trackers looking for the specific tracks of the problem elephant.

Listen was the local Game Ranger that was there to oversee the entire hunt.

James A. Kesteloot
Caprivi Safari

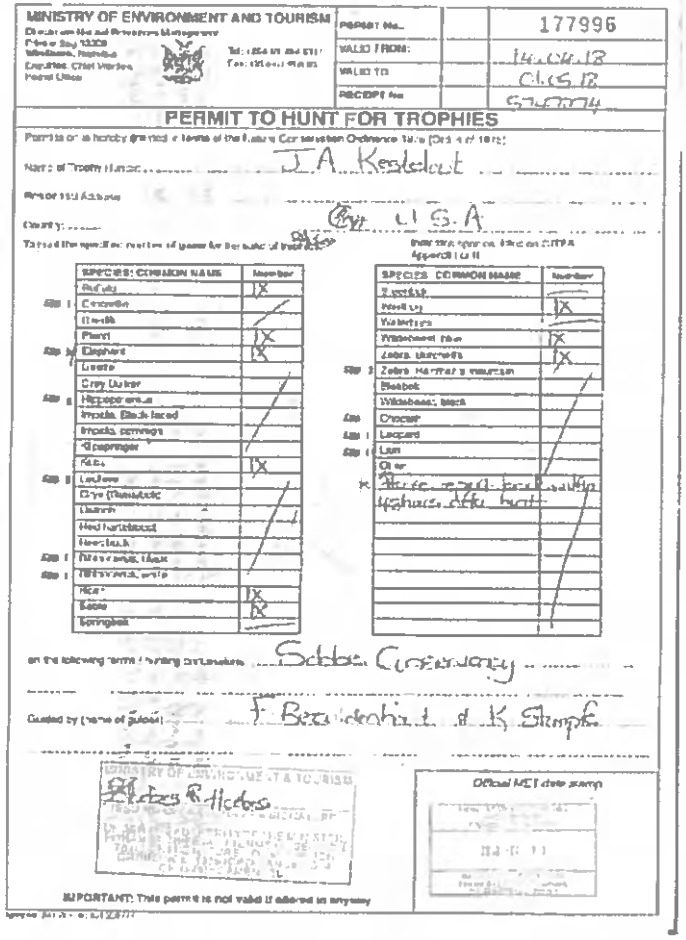
After 16 days of hunting the problem elephant, our paths finally crossed.
As you can see 20 plus villages were there to help process and distribute the meat to the village.

Very Happy Sobbe Village.
The elephant that kept getting into their crops was finally taken care of and they received 100% of the meat.

In Summary:

- $20,000.00 trophy fee for 1 elephant went to the Sobbe Conservancy; plus additional trophy fees for other animals taken.
- The Sobbe Conservancy received 100% of the meat.
- This took care of a problem Elephant that otherwise would destroy village crops and possibly hurt someone.
- More that 15 Sobbe people have jobs as a result of my and all other safaris in this area. (Trackers, Skinners, Cooks, Kitchen, Cleaning help, etc.)
- $5,000.00 from my safari goes to the anti-poaching group that protects the wildlife from poachers.

James A. Kesteloot
Caprivi Safari



MINISTRY OF ENVIRONMENT AND TOURISM

PERMIT No. 177996

VALID FROM: 14.04.18

VALID TO: 01.05.18

RECEIPT No. 5207074

PERMIT TO HUNT FOR TROPHIES

Name of Trophy Hunter: J.A. Kesteloot

Address: [redacted] USA

SPECIES: COMMON NAME	Number
Buffalo	1X
Crocodile	
Eland	1X
Elephant	1X
Gemsbok	
Grey Duiker	
Hippopotamus	
Impala, Black faced	
Impala, common	
Klipspringer	
Kudu	1X
Lechwe	
Oryx (Gemsbok)	
Ostrich	
Red hartebeest	
Roan buck	
Tsessebe, black	
Waterbuck, white	
Wild cat	1X
Zebra	1X
Springbok	

SPECIES: COMMON NAME	Number
Warthog	1X
Wildebeest, blue	1X
Zebra, Hartmann's mountain	
Blesbok	
Wildebeest, black	
Caracal	
Leopard	
Lion	
Other: Hyena add bait	

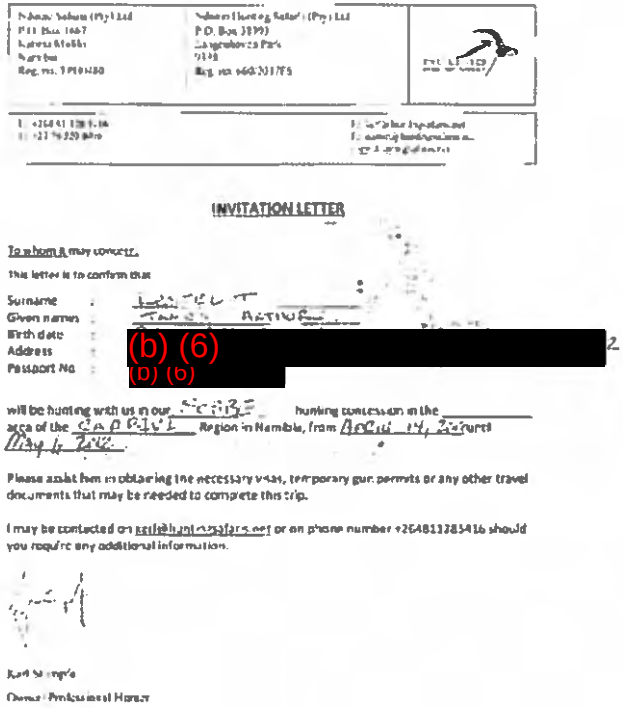
on the following terms / hunting concession: Sable Conservancy

Guided by (name of guide): F. Beukes, A. Hobbs & K. Stemple

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way

Hunting Permit # 177996



Ndumo Hunting Safari (Pty) Ltd
P.O. Box 1667
Katima Mulilo
Namibia
Reg. no. 1990/080

Ndumo Hunting Safari (Pty) Ltd
P.O. Box 3899
Ongwediva Park
9349
Reg. no. 2003/0175

INVITATION LETTER

To whom it may concern,

This letter is to confirm that

Surname : [redacted]
Given names : [redacted]
Birth date : [redacted]
Address : (b) (6) [redacted]
Passport No : (b) (6) [redacted]

will be hunting with us in our Sable hunting concession in the area of the Caprivi Region in Namibia, from April 14, 2018 until May 4, 2018.

Please assist him in obtaining the necessary visas, temporary gun permits or any other travel documents that may be needed to complete this trip.

I may be contacted on [redacted] or on phone number +264811285416 should you require any additional information.

Karl Stemple
Owner / Professional Hunter

Ndumo Hunting Safari Namibia Invite Letter

ndumo

CONTACT INFORMATION

Karl Stumpfe (owner & main professional hunter)

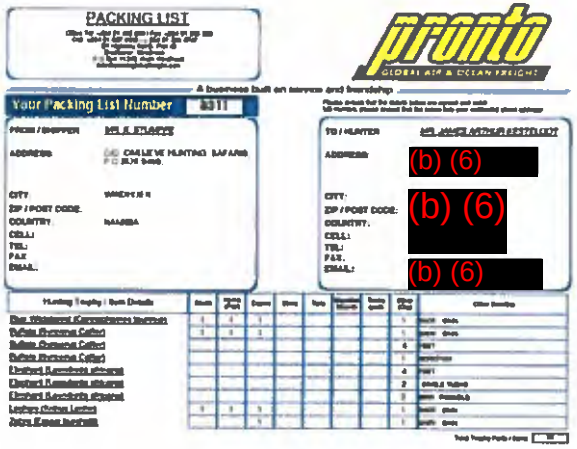
+264 811 285 416
karl@huntingsafaris.net
karlstumpfe@gmail.com

Colleen Collen

+27 73 093 1682
admin@huntingsafaris.net

James A. Kesteloot
Caprivi Safari

Ndumo - Outfitter Contact Information


PACKING LIST

pronto
GLOBAL AIR & OCEAN FREIGHT

A business built on service and friendship

Your Packing List Number 8311

FROM / SHIPPER: MR. E. STAATS

ADDRESS: (a) OMUEVE HUNTING SAFARIS P.O. BOX 5440

CITY: WINDHOEK

ZIP / POST CODE:

COUNTRY: NAMIBIA

CELL:

TEL:

FAX:

EMAIL:

TO / HUNTER: MR. JAMES ANTHONY KESTELOOT

ADDRESS: (b) (6)

CITY: (b) (6)

ZIP / POST CODE:

COUNTRY:

CELL:

TEL:

FAX:

EMAIL: (b) (6)

Hunting Trophy / Item Details	Skull	Skull Size	Capes	Skins	Furs	Trophy Weight	Trophy Size	Skull Size	Other Details
Blue Wildebeest (Connochaetes taurinus)	1	1	1					1	Skull, Cape,
Buffalo (Syncerus Caffer)	1	1	1					1	Skull, Cape,
Buffalo (Syncerus Caffer)								1	Skull
Buffalo (Syncerus Caffer)								1	Boss/Horns
Elephant (Loxodonta africana)								1	Skull
Elephant (Loxodonta africana)								2	SMALL TUSKS
Elephant (Loxodonta africana)								2	Skull, Feet(s)
Leopard (Panthera pardus)	1	1	1					1	Skull, Cape,
Zebra (Equus burchelli)			1					1	Skull, Cape,

Total Trophy Parts + Items: 10

No. of Boxes | Act. Weight (kgs) | Dimensions (cm's) | Insurance Requirements

Volumetric Weight (kgs) | Charge

Special Instructions / Shipping Instructions

James A. Kesteloot
Caprivi Safari

NAMIBIA LOGISTICS ASSOCIATION | AFRICA LOGISTICS NETWORK | FIATA | WORLD FREIGHT NETWORK (WFN)

Peter de Villiers

pronto
GLOBAL AIR & OCEAN FREIGHT

M +264 81 637 4666 peter@prontoglobalfreight.com
Office Phone: +264 61 402 993 Office Fax. +264 61 265 338 Fax to email: 088 637 49912
B1 Highway North, Plot #48, Brakwater, Windhoek, Namibia
www.prontoglobalfreight.com

All business is undertaken as per the terms and conditions found at www.prontoglobalfreight.com/tc.pdf

Shipping – Packing List - Contact Information

Hello,

I sent the attached application in February 2, 2019.

I never received an acknowledgement or permit number back from your SPITS System.

This was for a Leopard from Tanzania in July 2018.

Check number #5316 cleared on March 19, 2019. (also attached)

This was during the shutdown and was sent in regular mail.

I currently have an Elephant permit # 09890D from September 2018.

Also, just received my Mozambique Leopard permit # 34627D today.

(3-25-19) This was for my Leopard from September 2018.

In Summary, I currently have 3) application permits in with you.

1) Elephant Namibia 2018
1) Leopard Tanzania 2018
1) Leopard Mozambique 2018

Can you please send me the Permit # for the above and attached.

(b) (6)

Also, if I could get a status on the Elephant I would appreciate it.

Thank You

James A. Kesteloot

(b) (6)

TANZANIA

Form 3-200-19

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity: Import of Sport-hunted Trophies 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	1 b First Name	1.c. Middle Name/Initial	1 d. Suffix
Kesteloot	James		

2. Date of Birth (mm/dd/yyyy): (b) (6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1 a Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes): (b) (6)

1.b City	1 c State	1 d Zip code/Postal code	1 e County/Province	1 f Country
Holly	Michigan	48442	Oakland County, Michigan	United States of America

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: (b) (6) /2019

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

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.

James Arthur Kesteloot
(b) (6)

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

James Arthur Kesteloot
(b) (6)

OMB Control No. 1018-0093
Expires 08/31/2020

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. 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:

July 15, 2018

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Mkwawa Hunting Safari (T) LTD.
P.O. Box 40425, Dar Es Salaam
Tanzania

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:

Selous Game Reserve K4
Morogoro - Tanxania

Zone 37 S
0289638
UTM
9085172

e. Date wildlife is to be hunted:

July 15, 2018

f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Mkwawa Hunting Safari (T) LTD.
P.O. Box 40425, Dar Es Salaam
Tanzania
+255 655 092552
+255682 936010

Professional Hunter
Albert Lulinde
P.O. Box14248
Arusha Tanzania
+255782553600

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]:

Kipawa Industrial Area
Plot No: 137 Pugu Road
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).

Tanzania Hunting License
Permit no: 2010572

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: Mkwawa Hunting Safari (T) LTD
Address: P.O. Box 40425, Dar Es Salaam
Address:
City: Dar Es Salaam
State/Province:
Country, Postal Code: Tanzania, TZ

CERTIFICATION STATEMENT (original signature must be provided for either 9 or 10 below)

NA 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.

NA **Taxidermist/Broker's signature:** _____ Date: _____

OMB Control No. 1018-0093
Expires 08/31/2020

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 calen

Applicant's signatu (b) (6) Date: 02-04-2019

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.

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).**

ORIGINAL

19767

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

July 10, 2018 3:31:24 pm

IN.# 3151273

APP: 2010571

GAME HUNTING PERMIT

MAIN PERMIT

RETURN DATE: Saturday, August 25, 2018

PERMIT NO. 2010572

Station DAR ES SALAAM Start Date July 15, 2018 End Date August 04, 2018 Package Type 21 DAYS Extra Days: 0

This RESIDENT'S / VISITOR'S Permit is Granted to JAMES ARTHUR KESTELOOT of Address

Who holds Weapon (Type) RIFLE Calibre 375, 33NOSLER & 458 Maker's No: [redacted] Passport No. [redacted]

Licence No: [redacted] Dated 26-Jun-2018 Issued At C.A.R No: -

and entitles him to hunt the below animals in the (Game area and blocks) SELOUS GR R1 Weapon owner & Address JAMES ARTHUR

owned by MKWAWA HUNTING SAFARIS (T) LTD [redacted]

PH ALBERT LULINDE,

Additional Blocks SELOUS GR K4, PH CAT. LICENSE No.

	SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1	BABOON YELLOW	3	
2	BUFFALO AFRICAN CAPE	3	
3	BUSHBUCK CHOBE	1	
4	BUSHPIG	1	
5	CIVET AFRICAN	1	
6	CROCODILE NILE	1	
7	DOVE	5	
8	DUCK	5	
9	DUIKER COMMON	1	
10	DUIKER HARVEY'S RED	1	
11	ELAND LIVINGSTONES	1	
12	FRANCOLIN	5	
13	GEESE	5	
14	GENET BLOTCHED	1	
15	GUINEAFOWL	5	
16	HARTEBEEST LICHTEINSTEIN'S	2	
17	HIPPO	1	
18	HYAENA SPOTTED	1	
19	IMPALA SOUTHERN	2	
20	JACKAL SIDE STRIPED	1	
21	KUDU GREATER	1	
22	LEOPARD	1	
23	LION	1	
24	PORCUPINE CRESTED	1	
25	RATEL (HONEY BADGER)	1	
26	REEDBUCK SOHOR	1	
27	SABLE ANTELOPE ROOSEVELT	1	
28	SERVAL CAT	1	
29	SUNI (PYGMY ANTELOPE)	1	
30	WARTHOG	2	
31	WATERBUCK COMMON	2	
32	WILDEBEEST NYASA	2	

[redacted]

Signature of Holder

Signature of Issuing Officer & Official Stamp

Idara ya Wanyamapori
DAR ES SALAAM

DIRECTOR OF WILDLIFE DIV.
14 JUL 2018
P.O. BOX 1994
DAR-ES-SALAAM

1. The Hunting Permit must be surrendered to the Director of Wildlife Division within 30 days of expiry or immediately the Professional Hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on a live animal business of a Trophy dealer.
3. Maximum number of animals must not be exceeded without the written authority of the Director of Wildlife
4. A Hunter must obtain Certificate of Ownership for all trophies he wishes to keep, transfer.
5. A Professional Hunter conducting a safari must carry his/her PH Licence during the entire safari
6. A Professional Hunter conducting a safari must get a guide or obtain letter of authority from the Director of Wildlife to go out alone
7. For weapons indicate the heaviest rifle in the case of big game or shortgun in the case of birds or others in the case of fish.
8. A Professional Hunter conducting a safari must take all measurements and or weight and record them in the data sheet provided immediately after an animal shot and its carcass.

GAME KILLED

MINISTRY OF NATURAL RESOURCES AND TOURISM
WILDLIFE DIVISION

July 09, 2018 2:42:17 pm

PERMIT NO. 2010572

CLIENT NAME JAMES ARTHUR KESTELOOT

COMPANY MKWAWA HUNTING SAFARIS (T) LTD

PH NAME ALBERT LULINDE,

PH LICENSE NO

19767

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES		LENGTH OF HORN/ANIMAL OR WEIGHT	REMARKS
HARTEBEEST	1	K4	375	15/7/2018	06:20	m	0291409	9091567		
HYAENA	1	K4	375	16/7/2018	07:02	m	0294982	9085981		
ZEBRA	1	K4	375	17/7/2018	04:40	F	0305796	9097380		
LEOPARD	1	K4	375	20/7/2018	06:30	m	0289130	9092311		
WARTHOG	1	K4	375	21/7/2018	02:16	m	0290708	9084586		
BABOON	1	K4	375	21/7/2018	12:16	m	0295999	9085194		
BUFFALO	1	K4	375	21/7/2018	06:48	m	0297767	9087868		
IMPALA	1	K4	375	23/7/2018	11:30	m	0290868	9084044		
CIDET AFRICAN	1	K4	375	24/7/2018	06:42	m	0290868	9083691		
HIPPO	1	K4	375	24/7/2018	10:15	m	0296794	9083635		
WILDBEEST	1	K4	375	25/7/2018	07:05	m	0295082	9086636		
WARTHOG	1	K4	375	26/7/2018	07:06	m	0292986	9084586		
HARTEBEEST	1	K4	33L	26/7/2018	12:00	m	030009	9104842		
IMPALA	1	K4	375	26/7/2018	4:45	m	0292017	9090836		
BUFFALO	1	K4	458	28/7/2018	08:48	m	0306499	9097546		
BUSHBUCK	1	K4	375	30/7/2018	06:34	m	0296221	9085526		
BUFFALO	1	K4	458	31/7/2018	04:40	m	0304587	9100454		
WILDBEEST	1	K4	375	31/7/2018	12:05	m	0294525	9085024		

(b) (6) [redacted]

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 hunti

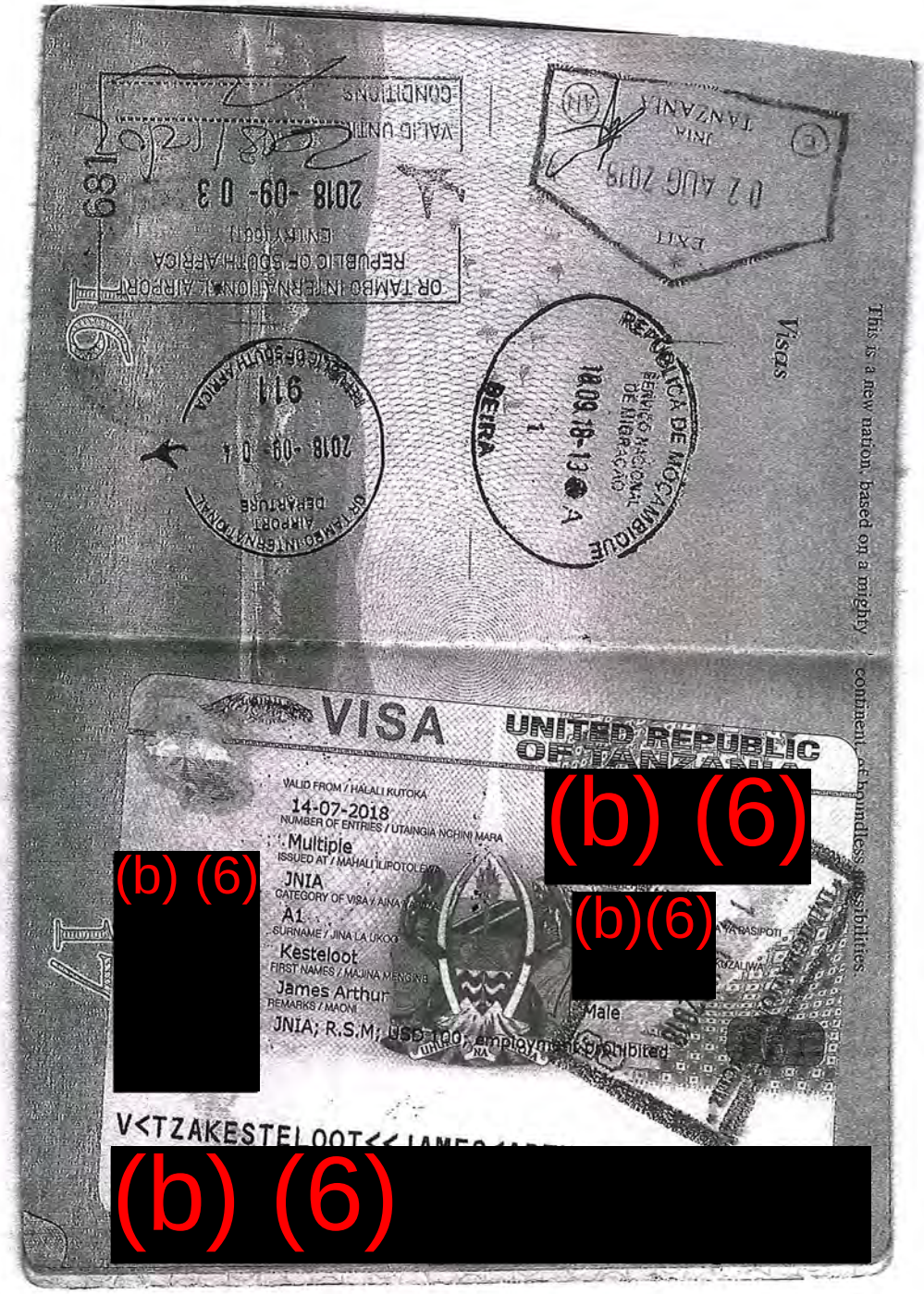
(b) (6) [redacted]

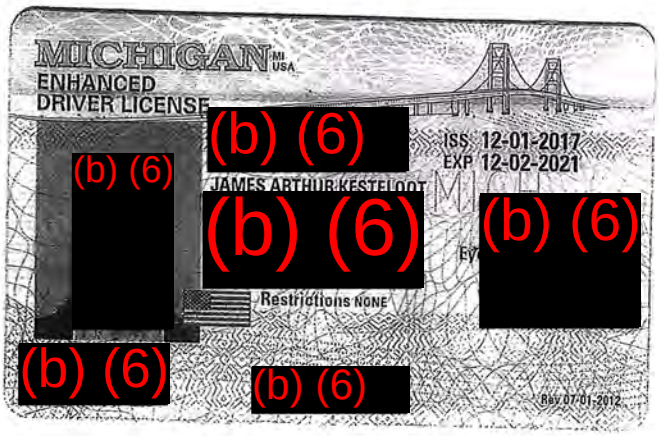
SIGNATURE OF THE HUNTING CLIENT

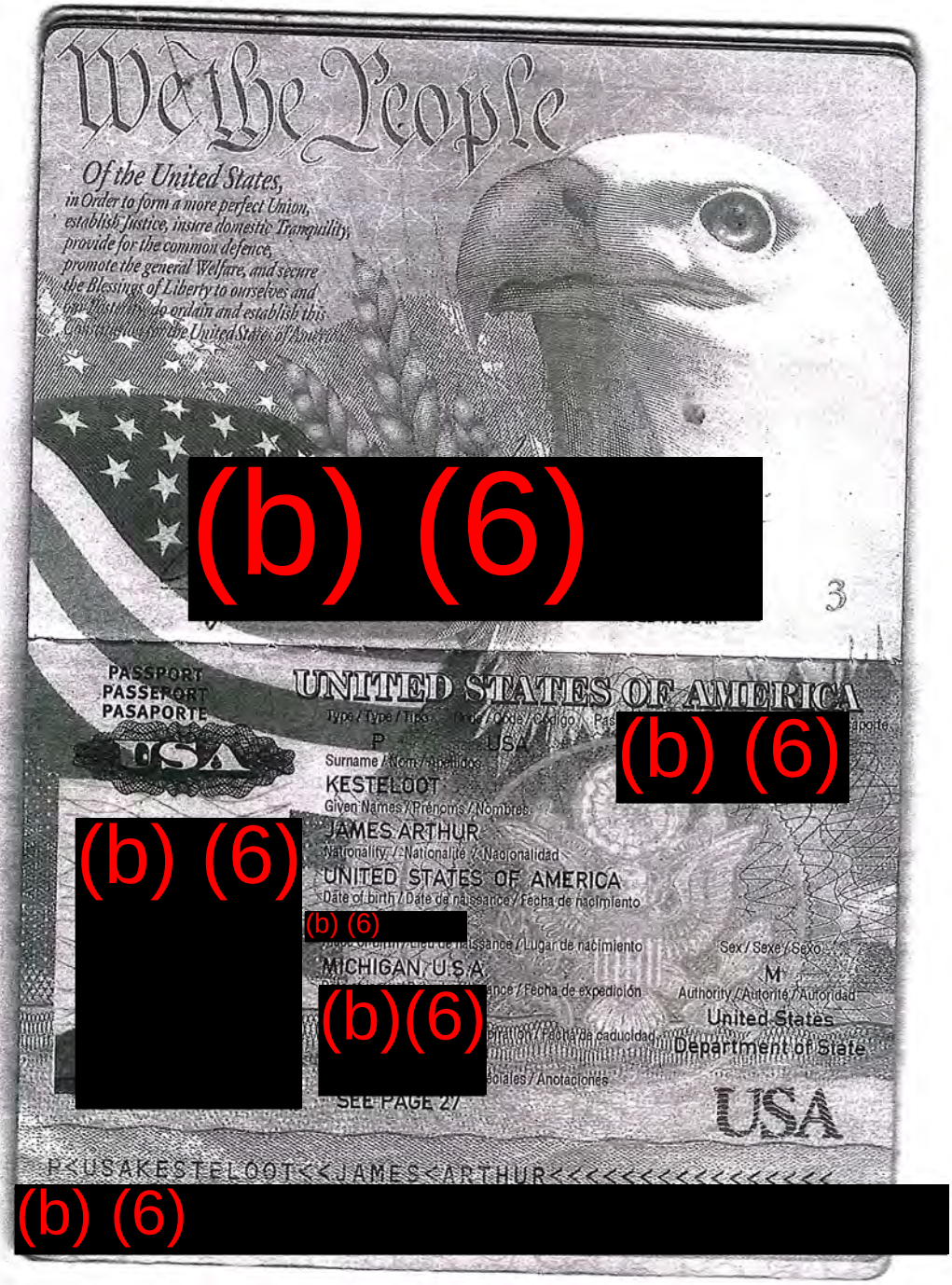
SIGNATURE OF THE PROFESSIONAL HUNTER

FOR SECTOR MANAGER NORTH WESTERN MSOLWA

SIGNATURE OF WILDLIFE OFFICER INCHARGE


Visas
This is a new nation, based on a mighty continent of boundless possibilities.
VISA
UNITED REPUBLIC OF TANZANIA
VALID FROM / HALALI KUTOKA
14-07-2018
NUMBER OF ENTRIES / UTAINGIA NCHINI MARA
Multiple
ISSUED AT / MAHALI ILIPOTOLEWA
JNIA
CATEGORY OF VISA / AINA
A1
SURNAME / JINA LA UKOO
Kesteloot
FIRST NAMES / MAJINA MENGINE
James Arthur
REMARKS / MAONI
JNIA; R.S.M; USD 100; employment prohibited
Male
(b) (6)
(b) (6)
(b)(6)
(b) (6)
V<TZAKESTELOOT<<
EXIT
TANZANIA
JNIA
07 AUG 2018
REPUBLIC OF SOUTH AFRICA
2018 -09- 03
2018 -09- 04
BEIRA
2018-08-13
REPÚBLICA DE MOÇAMBIQUE
SERVIÇO NACIONAL DE MIGRAÇÃO


MICHIGAN
MI
USA
ENHANCED
DRIVER LICENSE
(b) (6)
ISS 12-01-2017
EXP 12-02-2021
(b) (6)
JAMES ARTHUR KESTELOOT
(b) (6)
(b) (6)
Restrictions NONE
(b) (6)
(b) (6)
Rev 07-01-2012


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
(b) (6)
3
PASSPORT
PASSEPORT
PASAPORTE
USA
UNITED STATES OF AMERICA
Type / Type / Tipo
P
USA
(b) (6)
Surname / Nom / Apellidos
KESTELOOT
Given Names / Prénoms / Nombres
JAMES ARTHUR
Nationality / Nationalité / Nacionalidad
UNITED STATES OF AMERICA
Date of birth / Date de naissance / Fecha de nacimiento
(b) (6)
MICHIGAN, U.S.A.
Sex / Sexe / Sexo
M
Authority / Autorité / Autoridad
United States
Department of State
(b)(6)
SEE PAGE 27
USA
P<USAKESTELOOT<<JAMES<ARTHUR<<<<<<<<<<<<<<<<<<
(b) (6)

Makins, Monica <monica_makins@fws.gov>

CITES Pending permit number verification

1 message

Makins, Monica <monica _makins@fws.gov> Thu, Mar 28, 2019 at 3:01 PM
(b) (6)

Mr. Kesteloot

This message is in response to your letter received 3/27/19 requested the permit numbers for three pending CITES trophy permit applications

PRT-34627D leopard Mozambique received on 3/22/19
PRT-26446D leopard Tanzania received on 2/12/2019
PRT-09890D elephant Namibia received on 9/28/19
Thanks

Monica Thomas, Management Analyst
U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits
5275 Leesburg Pike,MS: IA
Falls Church, VA 22041-3805

Office 703-358-1992
fax 703-358-2280

Warning: This email may contain Privacy Act Sensitive Data, which is intended only for the use of the individual to which it is addressed. It may contain information that is privileged, confidential or otherwise protected disclosure under applicable laws.

Status of MA09890D (trophy import application)

Brisendine, Amy <amy_brisendine@fws.gov>

Mon 3/9/2020 2:02 PM

To: Jim Kesteloot (b) (6)
Cc: Brisendine, Amy <amy_brisendine@fws.gov>

Hi Mr. Kesteloot,

Your applicaon MA09890D is under r eview. We will contact you if we need addional in formaon. I apologize for the delay.

Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W059D
Falls Church, Virginia 22041
https://www.fws.gov/international/permits/
https://www.cites.org

Please see our application forms that are available for on-line submission here: https://www.fws.gov/international/permits/how-to-apply.html

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No. 1018-0164
Expires 11/30/2018

RCVD JAN 10 2018

1-10-18

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Roberts	Scott	Nelson	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			
5.a. Telephone number	**5.b. Alternate telephone number**	**5.c. Fax number**	**5.d. E-mail address**
(b) (6)			info@safarispecialtyimporters.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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Benton City	WA	99329		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Priscilla Fountaine for Scott N. Roberts (POA) — 12-27-2017

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: 0 (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: 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). Full Leopard

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: Salambala Farm (Closest Town Katima Mulilo), NAMIBIA
   9-9-2016

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

   Full

   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]:

   Reisner Taxidermy
   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	JAPSIE BLAAUW
Name: Address:	OMUJEVE SAFARIS
Address:	ONGOMBO WEST SECTION 2, NUMBER 56
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: _____

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: Rosella Quartarone for Scott N. Roberts (POA) Date: 12-27-2017

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):

SEE ATTACHED PREPAID FEDEX LABEL TO: Safari Specialty Importers, 758 Sheldon Rd, Wallkill NY 12589

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):

Rosella Quartarone, SAFARI SPECIALTY IMPORTERS
845-943-5943 or eMail info@safarispecialtyimporters.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.

SAFARI SPECIALTY IMPORTERS, INC.
"Hunting is Our Only Business"

Robert and Rosella Quartarone
P.O. Box 153
Pine Bush, NY 12566

1.845.943.5943
www.safarispecialtyimporters.com
info@safarispecialtyimporters.com

Authorization to Import

I, Scott N Roberts (Print Client Name), hereinafter referred to as the "Client", hereby authorize *Safari Specialty Importers, Inc.* and its successors, assignees or agents to act on my behalf for the importing and/or exporting of hunted trophies for my personal use. *This includes the authorization to obtain any necessary information, make payment on behalf of, and sign related paperwork needed for the importation of such trophies.*

I, the *Client*, agree to indemnify, defend, and hold harmless, *Safari Specialty Importers, Inc.* together with its successors, assignees or agents, from and against any and all demands, claims, and damages to persons or property, losses and liabilities, including reasonable attorney's fees, arising out of or caused by negligence or willful misconduct of any third party.

I, the *Client*, agree to the Payment Terms attached hereto and made a part hereof.

This Authorization to Import will remain in effect unless cancelled in writing by the undersigned.

(b) (6) [redacted]

Client Signature

9-11-17
Date

Scott N Roberts
Print Name

(b) (6) [redacted] Benton City, WA 99320
Address/City/State/Zip

(b) (6) [redacted]
Phone

(b) (6) [redacted]
eMail

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.:	
VALID FROM:	31.03.16
VALID TO:	14.04.16

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: S Roberts

Residential Address:

Country: USA

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
	Buffalo Kabula/Salam	1X
CITES I	Crocodile	/
	Dik-dik	/
	Eland	
CITES I/X	Elephant	1X
	Giraffe	/
	Grey Duiker	/
CITES II	Hippopotamus Lisse/Kabula	1X
	Impala, Black-faced	—
	Impala, common Salam	1X
	Klipspringer	—
	Kudu Salam	1X
CITES II	Lechwe	/
	Oryx (Gemsbok)	/
	Ostrich	/
	Red hartebeest	/
	Reedbuck	/
CITES I	Rhinoceros, black	/
CITES I	Rhinoceros, white	/
	Roan	/
	Sable	/
	Springbok	/

	SPECIES: COMMON NAME	Number
	Steenbok	—
	Warthog Salam	1X
	Waterbuck	—
	Wildebeest, blue Salam	1X
	Zebra, Burchell's Lisse/Salam	1X
CITES II	Zebra, Hartman's mountain	/
	Blesbok	/
	Wildebeest, black	/
CITES I	Cheetah	/
CITES I	Leopard	/
CITES II	Lion	/
	Other	/
	*Please report back within 48hrs after shooting	/

on the following farms / hunting concessions: Salambala + Kabulabula + Lisese Conservancy

Guided by (name of guides): J. Blaauw

Cashier receipt No. ME16324

Issued on 24.03.16

Amount received: N$ 100.00

Authorizing officer

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)

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
7-9-2016	Buffalo	184	34	34	252			10	♂	Kabulabula			[redacted] (9) (g)	
7-9-2016	Elephant							40	♂	Salambala				

*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.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD OCT 02 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
McCann	Matthew		

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			matt@genuslogistics.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

(b) (6) [redacted] #, Suite #, or Room #, no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Richfield	OH	44286		US

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Atty in fact — 9/25/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   GENUS LOGISTICS 161-15 ROCKAWAY BLVD ST 205 JAMAICA NY 11434 SASE INCL FEDEX / MATT MAYERS

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   MATT MAYERS 718 790 0216 MATT@GENUSLOGISTICS.COM

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

SOUTH AFRICA, HOOGGENOEG 184 JS MIDDLEBURG

b. Date wildlife was hunted:

8/1/2016

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

HERCULES OLIVER
341 KLIPRIVER
MIDDLEBURG SOUTH AFRICA 1050

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

BULLS EYE TAXIDERMY
OPEN SEASON FARM, CORNER
MELKRIVER AND STERKSTROOM ROAD
VAALWATER 0530 SOUTH AFRICA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). PH REGISTER, MPUMALANGA ELEPHANT HUNT PERMIT

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	BULLS EYE TAXIDERMY
Address:	OPEN SEASON FARM, CORNER
City:	MELKRIVIER AND STERKSTROOM ROAD
State/Province:	VAALWATER 0630
Country, Postal Code:	SOUTH AFRICA

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: 8/25/19

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

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 I 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

X Individual
___ Partnership
___ Corporation

CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, Matt MCann (Full Name of person, partnership, corporation, or sole proprietorship (identify)) a corporation doing business under the laws of the State of, OHIO or a doing business as Richfield Auto residing at (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 licensed broker as required by thr Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, steed 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 merchandize 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 merchandize; to receive any merchandize 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 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 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 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) Matt MCann
has caused t

(Signature) (b) (6)

(Capacity) _____ **(Date)** 8/29/18

WITNESS _____

Permit No: 12389

Mpumalanga
TOURISM AND PARKS AGENCY

PERMIT FOR THE HUNTING OF

Issued in terms of the Provincial Nature Conservation Act 10 of 1998

Date Stamp

★ [X] SPECIALLY PROTECTED GAME
★ [ ] PROTECTED GAME
★ [ ] ORDINARY GAME DURING A PERIOD WHICH IS *NOT AN OPEN SEASON*
★ [ ] PROTECTED WILD ANIMALS
★ [X] GAME IN A NATURE RESERVE

★ *Mark the square as indicated in the authorisation of the Chief Executive Officer*

Full name: MATTHEW MC CANN (b) (6)

and residential address of the holder of the permit: (b) (6)
44286 USA

Name of the owner of the land to be hunted on: (HLO - HERCULES OLIVIER)

PARTICULARS OF THE HUNT

Name of farm or nature reserve and district in which it is situated	Species, number and sex of game which may be hunted	Species, number and sex of game hunted and the time and date on which it was hunted
GREATER KRUGER PARK SPECIFIED FARMS LIMPOPO TRANSVAAL MOOSE CAMP	ONE (1) ELEPHANT	BULL IN ACCORDANCE WITH THE APNR AND SPECIFIED APPROVED QUOTA

In terms of and subject to the provisions of the Nature Conservation Act 10 of 1998, the holder of the permit is hereby authorised to hunt the species, number and sex of the game referred to in the second column of the particulars of the hunt on the farm or nature reserve referred to in the first column thereof during the period mentioned in the permit, subject to the conditions of the permit.

PERIOD OF VALIDITY OF THE PERMIT

The permit shall be valid for the period 23/ 20 16
to 07/05/ 20 16

Number and date of the authorisation of the Chief Executive Officer

Permit/licence Fees:

Received R 5000.00 Receipt No 27

Signature of the person authorised by the Chief Executive Officer to issue the permit: (b) (6)

WILDLIFE PROTECTION SERVICES
Private Bag X11328 Nelspruit 1200 Fax +27 (0)13 759 5405

SEE CONDITIONS OVERLEAF REVERSE SIDE

Printed by Word Power Printers 013 751 2472

OUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 42073

Professional Hunters' Association of South Africa

ation of Hunt: Commenced 19/07/2016 Terminated 03/08/2016

k 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)
					✓			

t Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

ame: Hercules Olivier

siness Address: 341 Klipriver, Middelburg

Code: 1050

No: 8411025069080

l Permit No: NTPA/PH/1657

ate: 03/08/16 Signature:

CLIENT

(b) (6)

HUNTING OUTFITTER

Name: Hercules Olivier

Business Address: 341 Klipriver, Middelburg Code: 1050

I.D. No: 8411025069080

Tel No: 0827722294 Fax No: n/a

HO Permit No: NTPA/HO/0757

Date 03/08/16 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
Boomenreg 18 JSJ		Wicus Coetzer	MPB/EX/1276		Buffalo	1		1	Skull + Skin
		Kwanare Trading			Kudu	1		1	Skull + skin
		PO Box 165			Blue Wildebeest	1		1	skull + skin
		Stoffberg, 1056			Zebra	1		1	skull + skin
					Waterbuck	1		1	skull + skin
					Eland	1		1	skull + skin
					Nyala	1		1	skull + skin
					Giraffe	1		1	skull + skin
					Steenbuck	1		1	skull + skin
					Impala	1		1	skull + skin
					Monkey	3			skin
Imbabat		Imbabat							
Goedehoop			12989		Elephant	1		1	Skull skin, tusks

ddress to which trophies are to be sent: 4486 Broadview Rd, Richfield, Ohio, 44286

ode: 44286 Country USA Trophy Export Date (Estimate):

Conservation Levy	
Total:	

pies:			
	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.

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:
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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: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed, wild-managed African 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
E: regina.lennox@conservationforce.org

Sign (b) (6)

Name: JAMES LESSIG

Date: 3/26/18

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
LESSIG	JAMES	ROBERT	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
	(b) (6)		

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
LITTLETON	COLORADO	80127	JEFFERSON	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.

(b) (6)

ied or stamped signatures) Date of signature (mm/dd/yyyy) 3/21/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

SAME

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

JIM LESSIG (b) (6) [redacted]

(b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(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 AR
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 le

Applicant's signatur (b) (6) _____ 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 permitto import a lawfully hunted ELEPHANT trophy.

Thisauthorityisinclusiveandextendstoallapplicationsandfilings, 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, ackhowledgements, notices and decisions concerning my application to import my trophyat 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) [redacted]

Name: BRYAN F. OTTMERS

Date: 3.19.2018

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD APR 10 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.**

A. Complete if applying as an individual			
1.a. Last name: OTTMERS	1.b. First name: BRYAN	1.c. Middle name or initial: F.	1.d. Suffix
2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address: (b) (6) [redacted]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information				
1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (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) [redacted]				
1.b. City: BOERNE	1.c. State: TEXAS	1.d. Zip code/Postal code: 78015	1.e. County/Province: KENDALL	1.f. Country: USA
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1.	Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))
2.	Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and ac(b) (6) [redacted] belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 100

03/19/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
   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 IANDOS ~~AVE~~
   City: NEW IANDOS, ~~AVE~~. 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: (b) (6) [redacted] Date: 3.20.2018

    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, *et al.*,	
Plaintiffs,	
v.	No. 17-cv-002530-RCL
Ryan ZINKE, *et al.*,	Judge Royce Lamberth
Defendants, and	
SAFARI CLUB INTERNATIONAL *et al.*,	
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^2 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 re-colonize 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

Wilfried Pabst

September 5, 2019

VIA CERTIFIED MAIL AND EMAIL

LB

David Bernhardt, Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240
exsec@ios.doi.gov

Margaret Everson, Principal Deputy
Director,
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington DC 20240
margaret_everson@fws.gov

Daniel Jorjani, Esquire, Acting Solicitor
Principal Deputy Solicitor
Department of the Interior
1849 C Street, S.W.
Washington, DC 20240
daniel.jorjani@sol.doi.gov

Karen Budd-Falen, Esquire
Deputy Solicitor for Parks and Wildlife
Department of the Interior
1849 C Street, S.W.
Washington, DC 20240
karen.budd-falen@sol.doi.gov

Eric Alvarez
Acting Assistant Director for International Affairs
U.S. Fish and Wildlife Service
1849 C Street, N.W.
Washington DC 20240
Aeric_alvarez@fws.gov

Director,
Division of International Conservation
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803

Dr. Mary Cogliano, Chief Branch of Permits,
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
mary_cogliano@fws.gov

Re: 60 day notice of intent to sue for failure and refusal to process elephant trophy import permit applications.

Dear Ladies and Gentlemen:

This is a 60-day Notice of Intent to Sue under the Endangered Species Act, 16 U.S.C. Sec. 1531 et seq. ("ESA"), for failure and refusal to process elephant trophy import permit applications in violation of the Administrative Procedures Act, 5 U.S.C Sec. 553 et seq. ("APA"), the Rules and Regulations of the Department implementing the ESA, *see* 50 CFR Part 17, the Special ESA Elephant Regulations, 50 CFR 17.40, regulations implementing the Convention on International Trade in Endangered Species of Wild Fauna and Flora, Mar. 3, 1973, 27 U.S.T. 1087 (hereinafter "CITES"), *see* 50 CFR Part 23, and the general permitting regulations of the United States Fish and Wildlife Service ("USF&WS" or "Service"), *see* 50 CFR Part 13.

This notice is on behalf of Dallas Safari Club ("DSC"), their members who desire to engage in trophy sport hunting of African elephants, outstanding elephant trophy import applicants, DSC conservation partners, including Sango Safaris, the Namibia Ministry of Environment and Tourism, the Namibian Association of CBNRM Support Organisations ("NASCO"), and the individual permit applicants set forth on Attachment A to this letter.

The African elephant (*Loxodonta africana*) is listed as threatened under the ESA and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(e)]. The 4(d) special rule lists the requirements for the import of sport-hunted trophies. Under paragraph 17.40(e)(6)(i)(B), for the USF&WS to issue a threatened species permit under 50 CFR 17.32, authorizing the import of a sport-hunted elephant trophy, the Service must make a determination that the killing of the trophy animal will enhance the survival of the species.

Pursuant to the APA, the Service is required to process these permit applications and make a decision on them within a reasonable time. 5 USC 558(c). 50 CFR 13.11 provides

that permit applications will be processed "as soon as possible." And 5 USC 706 provides for judicial review of "agency action unlawfully withheld or unreasonably delayed." Moreover, the delay is denial without appeal in violation of 50 CFR 13.29 or judicial review, *see* APA section 706. The delay also conflicts with the duty the Service has under the ESA to recover the listed species and the enhancement that the permitting would encourage, thus violating 16 U.S.C. 1533(f) and 16 U.S.C. 1540.

A "hold" has been put on the processing of all elephant trophy import permit applications since November 2017 after President Trump issued two "tweets" on 17 and 19 November 2017 on his Twitter account @realDonaldTrump. The effect of this hold following the President's tweets has been to injure conservation efforts designed to protect the African elephant. This hold is further injurious to the people of the countries the elephants inhabit as the local population benefits from controlled sport hunting of elephants, a fact the Service has previously acknowledged.

Although positive enhancement determinations for Zambia and Zimbabwe were made immediately before the "hold" in November 2017, Namibia and the Republic of South Africa enhancement findings were neither new nor disputed. The positive enhancement determination for Zambia had not been suspended. By any standard, the countries of Botswana, Namibia, South Africa, Tanzania, Zambia and Zimbabwe have done nothing to deserve this mistreatment, and breach of treaty, law and regulations. A "tweet" is not a proper rule making. Moreover, this hold has been extended to all elephant trophy imports including from countries where the Service had longstanding positive enhancement findings that were the "gold" standard.

Subsequently, on March 1, 2018[1], the Service issued a memorandum in response to the D.C. Circuit Court's opinion in *Safari Club Intl., v. Zinke*, 878 F.3d 316 (D.C. Cir., 2017) which withdrew enhancement findings, including the enhancement findings for Zambia and Zimbabwe, and stated that

> All of the above referenced findings are no longer effective for making individual permit determinations for imports of those sport-hunted ESA-listed species. However, the Service intends to use the information cited in these findings and contained in its files as appropriate, in addition to the information it receives and has available when it receives each application, to evaluate individual permit applications. The Service is continuing to monitor the status and management of these species in their range countries. At this time, when the Service processes these permit applications, the Service intends to do so on an individual basis, including making ESA enhancement determinations, and CITES non-detriment determinations when required, for each application. The Service intends to grant or deny permits to import a sport-hunted trophy on a case-by-case basis pursuant to its authorities under the ESA and CITES.

[1] https://www.fws.gov/international/pdf/memo-withdrawal-of-certain-findings-ESA-listed-species-sport-hunted-trophies.pdf

> As part of the permitting process, the Service reviews each application received for import of such trophies and evaluates the information provided in the application as well as other information available to the Service as to the status of and management program for the species or population to ensure that the program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized.

This determination was not made as the result of the rule making proceeding ordered by the court in *Safari Club Intl. v. Zinke,* and would appear directly inconsistent with the court's opinion. Nonetheless, despite the statements contained in the Service's March 1, 2018, memorandum, all elephant import permits have remained on "hold." This is true for pre-act elephant trophies and renewal applications for elephant trophy import permits predating the "hold." The Service is not processing elephant import permits on a case by case basis or on any basis whatsoever. This lack of action is contrary to the law and applicable regulations.

The Service is unlawfully employing the "hold" on elephant trophy import permitting to elephant trophy imports from all countries, and even to the simple renewal of elephant import permits and to pre-act elephant trophies. The "hold" has been applied unlawfully to the detriment of the very best and most successful elephant management programs in Africa. The broadly applied "hold "was not a duly noticed and made rule making, was arbitrary, capricious and irrational, and greatly threatens the elephant and range nation programs the ESA and CITES aim to encourage and enhance. Indeed, the "hold" jeopardizes and obstructs years of conservation activities in Southern and a substantial part of Eastern Africa.

Tanzania, Zambia, Zimbabwe, Mozambique, Botswana, Namibia and South Africa hold an estimated 340,000 elephants out of a continental total of 415,000, i.e. 82 per cent of the elephants of Africa. The conservation success of these countries is linked to policies incorporating sustainable use of natural resources, based on science and aiming at improving livelihoods of rural communities while maintaining vast tracts of unspoiled habitat and ecosystems.

The tolerance by the rural citizens of Southern and Eastern Africa of elephants is increased through hunting revenue sharing systems in place throughout the region. The presence of substantial herds of elephants risk serious devastation of the crops on which the rural African population depend. Without the revenue generated by sport trophy hunting, the population would view the elephant more as pests than as a natural resource. Moreover, overpopulation of elephant threatens the habitat of other threatened species. *See* Statement of Sango Safaris, Attachment B.

The "hold' obstructs 70 per cent of the revenue of the Community Conservancy Program in Namibia. All tourist safari hunting of elephant occurs in community

conservancy areas. Likewise the hold obstructs the same percentage of the revenue of the 700,000 families which depend on the CAMPFIRE Program in Zimbabwe. The "hold" undermines the community Wildlife Management Areas in Tanzania that are intended to provide incentivizing livelihoods to rural communities and to act as corridors for elephant and other species between protected areas. The "hold" obstructs the community program in Zambia which largely relies upon tourist safari elephant hunting. The "hold" largely blocks the developing elephant conservation strategy in Botswana that recently has lifted the suspension of tourist safari hunting. Tourist safari elephant hunting had previously been 70 per cent of community revenue in that country.

Therefore, the "hold" is jeopardizing conservation efforts in these countries and threatens the livelihood of more than one million persons and the biodiversity of millions of hectares of pristine wilderness. Without the management and revenues from tourism hunting, these lands are being encroached and converted to agro-pastoral land, leading to the unavoidable extinction of wildlife and natural habitats, and the collapse of ecosystem services.

The successful elephant conservation as well as the control of poaching largely depend upon the sustainable use conservation strategy in the form of elephant tourist safari hunting in each of these countries. The elephant populations and programs in these countries cannot be sustained without the revenue generated by safari hunting and U.S. import of the trophies; hence the "hold" is *the* major threat to the survival of the largest remaining elephant populations in Africa. Hundreds of thousands of elephants are in jeopardy and more than a million families are being deprived of the realization of their single most valuable natural resource because of this illegal "hold."

Finally, tourist safari hunting of elephant is governed by sound administrative systems in all countries that include scientific based quotas supported by CITES non-detriment findings, law enforcement largely funded or carried out by safari hunting operators on the largest share of wild habitat, regulatory permitting, and community-based conservation programs, most of which was supported by over one-hundred million dollars of USAID funding because of its conservation and humanitarian merit.

In conclusion, on behalf of DSC, its members, outstanding elephant trophy import applicants, and DSC conservation partners, and for the reasons stated in this notification, we intend to sue under the Endangered Species Act for failure and refusal to process elephant trophy import permit applications.

Respectfully,

Scott Tobermann
DSC President

13709 Gamma Road, Dallas, TX 75244 * (972) 980-9800 * Fax (972) 980-9925
E-Mail: info@biggame.org * Webpage: www.biggame.org

INDIVIDUALS WITH PERMIT APPLICATIONS PENDING

ATTACHMENT A

PRT #	Last Name	First Name	Area	Date of Hunt	Date of Application
93406C	Evans	Milton Karl	Zimbabwe, Dande North Hunting Concession	5/17-5/30/2018	5/10/2018
84788C	Reeves	Steve	Zimmbabwe, Semore 1 +2 , TTL Campire Ares	April 13-24, 2018	3/7/2018
MA18507C-0	Rogers	Anthony	Zimbabwe, Matabeland South	7/29-8/16, 2017	1/11/2017
MA33591C	Cheek III	Atlas	Zimbabwe, Chewore North Safari Area	7/28/2014	4/18/2017
US58155C	Crippen	Daniel	Zimbabwe, Matetsi Safari Area, Unit 5, Victoria Falls	8/11/2017	9/25/2017
MA57769C-0	Crippen	David	Zimbabwe, Matetsi Safari Area, Unit 5, Victoria Falls	8/20/2017	9/25/2017
033669C/9	Hanson	Arlene & Bob	Zimbabwe, Tsholotsho	9/1/2016 to 9/15/2016	
MA48117D	Weaver	John	Namibia, Zambezi (Caprivi) Region		6/28/2019
83103C	Saulsbury	Mark	Namibia, Nyae-Nyae Conservancy	8/8/2017	3/5/2018
85343C	Ottmers	Bryan	Zimbabwe, Save Valley Conservancy	8/1/2015 to 8/14/2015	3/19/2018
	Pirkle	Mark	Namibia, Shamakuve Concession	9/14/2019 to 10/14/2019	6/20/2019
MA06118C	Easter	Joe (Lane)	Zimbabwe		

Attachment B

STATEMENT OF SANGO SAFARIS OF SAVE VALLEY SAFARIS, ZIMBABWE

Sango Safaris represents a 60,000 hectare property, situated within the Save Valley Conservancy ("SVC") in the South Eastern Lowveld of Zimbabwe.

The annual 2018 aerial survey, carried out every September/October for the past 20 some years showed a population of 665 elephant on Sango last year. As an average in recent years we have from 600 to over 900 elephants on Sango at any given moment. Our ecologically established carrying capacity ranges between 200 to 300 elephants. Therefore, we have at any given moment between 400 to 700 too many elephants on Sango with devastating destruction not only to the food base of the species causing the destruction but with dire consequences for all other plains game animals.

For example the Elephants' destruction as well as decreasing rains have resulted in our zebra and wildebeest herds dropping from 1,500 to 2,000 to around 600 of each species today. Similar numbers are experienced for all other grazers. Aerial Survey numbers for elephants on Sango since 2009 are as follows:

No. Elephants	Year
654	2009
462	2010
393	2012
648	2013
474	2014
497	2015
949	2016
684	2017
665	2018

The latter shows a current density of 1.1 elephant per square kilometer, whilst the recommended density is 0.2-0.3 per square kilometer for the dry Savanna areas we occupy.

The continued high density of elephant has and is having a very negative affect on Sango's habitats. For example the baobab trees of which we have an abundance are often hundreds if not thousands of years old. Approximately 90 per cent of all of our baobab trees are now suffering damaged by elephants. If this remains unaddressed Sango will have lost all its baobab trees in a matter of a few years.

Sango practices "sustainable utilization" and is proactive in the use of its excess animals, which income funds our further conservation efforts. To this end, Sango moved 100 live elephants to reduce their numbers and to help restock the Zimbabwe National Parks area in 2018. Such translocation solutions do not exist regularly as most national parks and private conservancies within a survivable translocation distance from Sango are overstocked with elephants as well.

The annual elephant hunting quota amounts to three older bulls for Sango and seven in total for the SVC. All funds generated from hunting flow fully towards running, protecting and maintaining the property and specifically its wildlife assets and the underlying habitats. This includes employment for 135 local people (44 of whom are anti-poaching scouts) provision of water for wildlife, fire breaks, road and infrastructure maintenance and a full time ecologist.

Sango forms the largest single property within the SVC. The most recent SVC elephant numbers are from a 2017 Aerial survey, (2,390 km2 of operating properties) and showed that SVC was home to 2038 elephants. This is an average of 0.85 elephant per km2 when the recommended density is 0,2-0,3 Km2. As per above formula this implies that we have approximately 1,500 elephants too many. However, we believe that the total elephant population in the SVC amounts presently to some 2,500 animals.

Elephant safaris bring in between $60 - 70,000 for each elephant. WWF recommends a trophy hunting quota of 0.75 per cent of an elephant population whilst we are not even hunting half of that quota. So the SVC and its members are prejudiced of a potential $420-720 thousand that can be used for conservation. This negatively affects, employment of local people, water pumping, fire break maintenance, etc. Our highly successful rhino anti-poaching efforts cost about $500-600,000 per year. Under the most adverse conditions we have grown our rhino population from some 42 animals in the mid 1990's to about 190 today.

If the hunting income is thus disallowed from sustainably using our elephant population, we would no longer be able to fund the protection of our highly endangered rhinos. Is there anything more proactive in conservation than using the income from one species present in excessive numbers to protect another which is highly endangered? By denying the importation of trophies into the USA major income is no longer available for the protection of endangered and highly endangered species. Our poachers would welcome this action by the US Government; we highly successful conservationist do not.

[EXTERNAL] Supplement to all outstanding Zimbabwe Elephant Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Tue 6/2/2020 4:57 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (1 MB)

SupplementalLettertoUSFWS.zimbabweElephants.docx; CampfireConcernonImportBans.pdf;

Mr. Brisendine,

Please see the attached letter and document to be included with all applicants listed, which should be all outstanding elephant import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

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June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Elephant** import permit applications for applicants listed below – all in Zimbabwe

Atlas Cheek, III	33591C
Michael Condon	53018D
Daniel Crippen	58155C
David Crippen	57769C
Joe Easter	06118C
Brent Goyen	05190C
Arlene Hanson	03369C
John Johnson	53722D
Jonathan Jones	14862D
Donald Moritz	70854D
Jeffery Nicholas	10635C
Sam Noble	09883C
Sam Noble, Jr.	988649C
Sam Noble Jr.	09644C
Bryan Ottmers	85343C
Steve Reeves	84788C
Anthony Rogers	18507C
Stephen Shell	No PRT # (would like to get #)
Thomas Whaley Jr.	04847C
Todd Williams	76700D

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for elephants in Zimbabwe that further detail the elephant populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the

value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

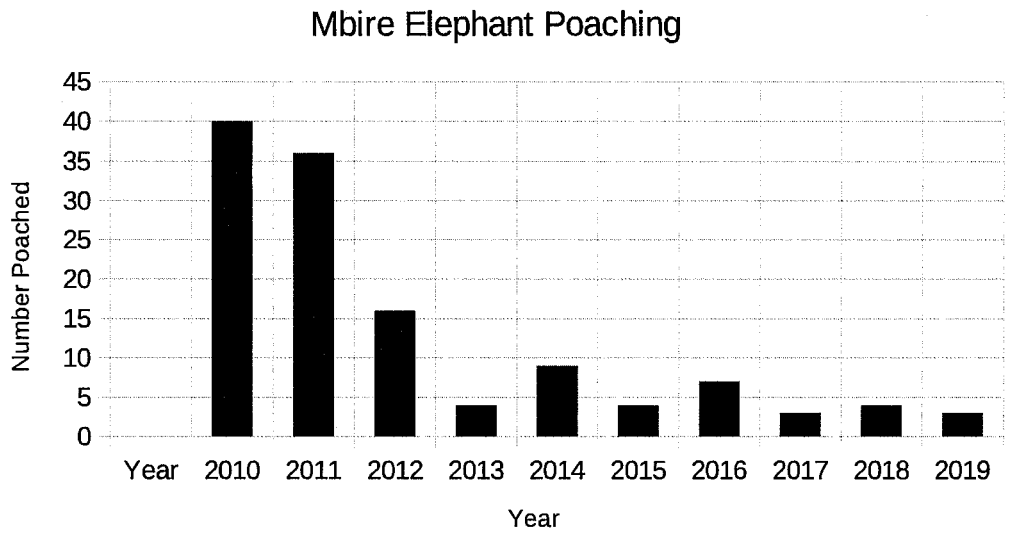


Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

CAMPFIRE Association

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

[EXTERNAL] #85343C Bryan Ottmers - Supplement to pending elephant import permit application - Zimbabwe

Aimee Korver <permits@conservationforce.org>

Tue 7/28/2020 4:27 PM

To: Management Authority, FWHQ <ManagementAuthority@fws.gov>; John Jackson, III <jjjiii@att.net>; (b) (6) (b) (6)

1 attachments (27 MB)

#85343CBryanOttmersSupplementtoElephantImportApplication.zip;

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

To Whom it May Concern,

Attached you will find the zipped file of information to add as a supplement to the Import Application # 85343C for Mr. Bryan Ottmers. This import permit application is for an elephant trophy from Zimbabwe. This trophy was taken in 2015.

Please let me know if you have any question and that you have received these documents.

Thank you,

Aimée *Korver*

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

APPLICANT:

BRYAN OTTMERS

SAVE VALLEY CONSERVANCY: ELEPHANT COLLARING REPORT (2018)

SAVÉ VALLEY CONSERVANCY ELEPHANT COLLARING REPORT DECEMBER 2018

Operations Report

Compiled by: Don Jooste

INTRODUCTION

Limited knowledge is available when considering the dispersal movements of the elephant population within the Savé Valley Conservancy (SVC). With a relatively young, exponentially increasing elephant population, it is a known fact that young elephants, especially bulls, will continually disperse. The dispersal of these younger bulls are generally unknown to Management of the SVC. What has however become clear is that the human wildlife conflict pertaining to elephants in the neighboring communities has increased. Therefore it was proposed to collar a total number of four bulls within the SVC system. Four elephant bulls were collared in mid-December of 2018 under permit numbers *46 (2)(e) & (g)01/2018 & 46 (2)(e) & (g)22/2018 Ref: D/277*. The collaring of elephant would allow for the SVC to generate a greater understanding of elephant movement especially pertaining to the mitigation of Human-Wildlife Conflict. With greater knowledge at the disposal of the SVC more informed decisions can be made to reduce Human-Wildlife conflict within the immediate communities surrounding the SVC.

PROCEDURE

The darting was conducted by Josh Mostert, dangerous drugs license number: *DDL 2018/34*. The darting exercise was also monitored by National Parks Ranger, Livison Ashliani, based at Senuko Ranch. Professional Hunter, Guy Whittall, license number *421*, accompanied the darting crew for safety reasons. All necessary National Park representatives were informed about the operations. The darting was conducting over a total of five days, from the 12th to the 17th of December 2018. Four elephant bulls were darted on the following dates:

1. *14/12/2018*
2. *14/12/2018*
3. *15/12/2018*
4. *17/12/2018*

The elephants were darted on Humani Ranch (1 & 2) and on Sango Ranch (3 & 4). All four elephants that were darted were young bulls with an estimated age ranging from 20 – 35 years. The targeted elephant bulls were all considered to be of non-trophy quality, and below an acceptable age of harvesting and/or possessing ivory which was deemed below average for trophy quality specific to the area. (*Please see attached appendices for data gathered from collared bulls)*

All four elephant bulls were successfully darted without any incidents. The bulls were darted on foot. All four elephant bulls were fitted with Satellite Collars manufactured by AWT. The collars are programed to 6 GPS readings per day or one reading every four hours, which allows for an accurate, energy saving monitoring program. With the readings set to the abovementioned, the batteries on the collars will in theory last for an estimated 24 – 36 months depending on various external factors. All data recordings of the four elephant bulls collared can be seen in Appendix I.

By collaring these four elephants, it is hypothesized that the SVC will generate a greater understanding of elephant movements. It is furthermore hypothesized that these elephant will help identify elephant dispersal patterns. Younger bulls such as the collared individuals will also be more likely to move beyond the identified boundaries of the SVC. Within monitoring these movements, the SVC will gather a greater understanding of Human-Wildlife Conflict. This information will enable the SVC to identify areas that are prone to Human-Wildlife Conflict which will allow the SVC to apply adaptive management to minimalize conflict and/or loss due to problem animal control.

Data from the abovementioned monitoring program will shed light on the limited knowledge within key elephant populations found in the Lowveld of Zimbabwe. The SVC has been monitoring its wildlife since 2004 by making use of annual aerial surveys, supplying both

landowners and Zimbabwe National Parks & Wildlife Authorities with population trends over the years. Positive population trends indicate a healthy elephant population within the SVC.

With the opportunity to now understand and gather data on elephant movement, Zimbabwe National Parks & Wildlife Authorities alongside the SVC will gain a greater understanding of the species movements which would hopefully assist in Human-Wildlife Conflict mitigation. This will produce information where communities and wildlife could potentially coexist with minimal loss to both wildlife, as well as human sustainability in the form of crops.

Data reports from information and movement statistics gathered from these collars will be provided to National Parks on an annual basis.

Appendix I.

Elephant Data Information

ID	SVC-634
GPS Position of Collar Fitment	20.26832 32.212336
Date of Collar Fitment	14/12/2018
Estimated age	30 years

Measurements (cm)		
	Left	**Right**
Back feet length	44	not measured
Back feet circumference	110	not measured
Ivory Length	58	no tusk
Ivory Circumference	42	no tusk
Ear Picture	no	yes

ID	SVC-667
GPS Position of Collar Fitment	20.25782 32..15392
Date of Collar Fitment	14/12/2018
Estimated age	20 years

Measurements (cm)		
	Left	**Right**
Back feet length	49	51
Back feet circumference	not measured	not measured
Ivory Length	71	76
Ivory Circumference	86	81
Ear Picture	yes	no

Appendix I continued...

ID	SVC-689
GPS Position of Collar Fitment	20.26892 32.12304
Date of Collar Fitment	15/12/2018
Estimated age	35 years

Measurements (cm)		
	Left	**Right**
Back feet length	59	59
Back feet circumference	not measured	not measured
Ivory Length	42	69
Ivory Circumference	32	32
Ear Picture	yes	no

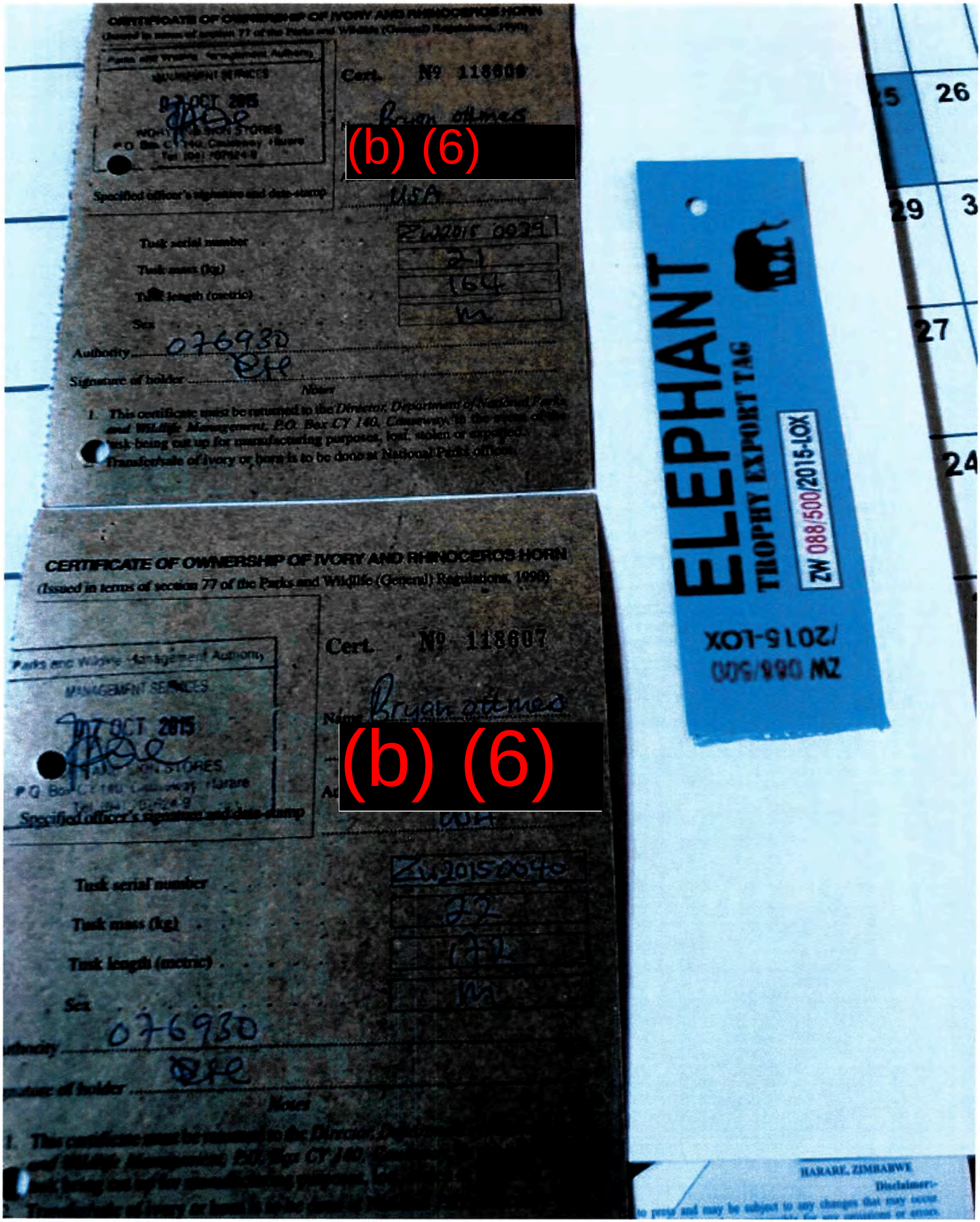
ID	SVC-690
GPS Position of Collar Fitment	20.163964 32.53948
Date of Collar Fitment	17/12/2018
Estimated age	25 years

Measurements (cm)		
	Left	**Right**
Back feet length	52,5	53
Back feet circumference	128	126,5
Ivory Length	58	51
Ivory Circumference	29	27,5
Ear Picture	no	yes

APPLICANT:

BRYAN OTTMERS

HUNTING PERMITS


CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN
Cert. № 118607
(b) (6)
Tusk serial number
Tusk mass (kg)
Tusk length (metric)
Sex
076930
Authority
Signature of holder
ELEPHANT
TROPHY EXPORT TAG
ZW 088/500/2015-LOX
HARARE, ZIMBABWE

050 Nº 000987

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 10 on reverse)

PHL

PHL 29
Amount Paid$400
Date 05/02/2015
Rec. H10R056847

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

HUNTING PERMIT

PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*],

to Sango

of Save Valley Conservancy

and co-hunter .....

of .....

Firstly to hunt in Hunt Number or Section: Sango-(Chanuruwe & Sabi) the Masvingo Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01/01/2015 and 31/12/15 (inclusive dates).

Animal	A	B	Animal	A	B	Animal	A	B
Antbear	1		Elephant (m)	1		S. Hyena	1	
Baboon	15		Francolin	20		Hyrax	10	
Buffalo (m)	21		Geese	10		Impala (m)	80	
Bushbuck(m)	10		Genet	8		Jackal B/B	4	
Bushpig(m)	10		Giraffe (m)	9		Klipspringer	2	
Civet cat	6		Grysbok	2		Kudu (m)	20	
Crocodile	2		Guinea Fowl	10		Leopard (m)	8	
Ducks	20		Hare	10		Mongoose	10	
Duiker	4		Hippo	1		Monkey	10	
Eland (m)	15		Honeybadger	6		Nyala (m)	3	

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 hereof.

A. MARUZA

30 MAR 2015
HEAD OFFICE
P.O. BOX CY 140 CAUSEWAY HARARE

for and on behalf of the Director General, Parks and Wildlife Management Authority

Designation: Head - Management Services

for and on behalf of Director General, Parks and Wildlife Management Authority

Designation: Director Commercial

050 Nº 000999

NE/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 figure in this box (See paragraph 16 on reverse)

PHL:

PHL 29
Amount Paid$400
Date 05/02/2015
Rec. H108056847
continued from 000987

(payment details)

ORIGINAL
VALID AS AUTHORITY TO HUNT

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

HUNTING PERMIT

PARKS AND WILDLIFE ACT [*CHAPTER 20:14*]

Permission is hereby granted on the authority of the Minister of Environment and Natural Resources Management in terms of the Parks and Wildlife Act [*Chapter 20:14*].

to Sango

of Save Valley Conservancy

and co-hunter

of

Only to hunt in Hunt Number or Section Sango-(Chanurwe & Sabi) in Masvingo Area, such number of animals as is indicated in column "A" below against the name of the animals specified. Such hunting shall be conducted during the period extending between 01/01/2015 and 31/12/15 (inclusive dates).

Animal	A	B	Animal	A	B	Animal	A	B
Pigeons / Doves		10	Buffalo (F)		4	xxxxxxxxxxxxxxxxxxxxxxx		
Porcupine		2	Eland (f)		1			
Sable (m)		2	xxxxxxxxxxxxxxxxxxxxxxx					
Sandgrouse		10						
Squirrel		10						
Warthog (m)		30						
Waterbuck (m)		13						
Wildcat		2						
Wildebeest (m)		30						
Zebra		40						

Annually 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.

Thereby 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 hunter and his co-hunter appointed at the time of issue of this permit.

This permit is issued strictly subject to the terms and conditions which appear on the reverse.

Date stamp of authority which issued permit

Parks and Wildlife Management Authority
MANAGEMENT SERVICES-COMMITTIVE
30 MAR 2015
HEAD OFFICE
P.O. BOX CY 140 CAUSEWAY, HARARE
TEL: (04) 703434-9/703181-9

A. MAKUZA

for and on behalf of the Director General, Parks and Wildlife Management Authority

Signature

Designation Park Manager

for and on behalf of Director General, Parks and Wildlife Management Authority

Designation DIRECTOR COMMERCIAL

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)

0000076930
HUNT_FUNDS_CAPTURED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Zambezi Hunters	Client's Full Name	Bryan Ottmers
ZTA (HOP) No.	HOP0212	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	Chishakwe Ranch P.O.Box 47 Birchenough Bridge zambezihunters@zol.co.zw	Address	(b) (6)
Name of Professional Hunter	THIERRY LABAT	Licence No.	157
Telephone		Fax	NIL
Number of Accompanying Guests		1	
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 PrL	Address	6 RIVONIA ROAD MOUNT PLEASANT HARARE
Name of Shipping Agent	Chipitani Safari Co	Address	6 Rivonia Drive Mount Pleasant
Name of Foreign Agent	Safari Marketing Company	Address	5355 Northland Drive, Suite C104, Grand Rapids, MI 49525

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Sango	Masvingo	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	01-08-2015
Date of Safari To	14-08-2015
Daily Rate Charged For Big Game USD	1,850.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non Hunting guests USD	350.00
Number of Accompanying Guests	1

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	16-MAR-2015	nullnull		USD	34,796	10,000.00
2	2nd JAN-2015	nullnull		USD	30,796	8,713.6
3	13-FEB-2015	nullnull		USD	33,796	21,000
4	23-FEB-2015	nullnull		USD	33,796	10,000

(II) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	33,900.00	Total Darata rate	3,530.00
Less Commission	4,409.64	Total Trophy fees	27,480.00
Other fees (incidentals)	1,944.00	Grand Total USD	54,394.16
Percentage Commission Charged	7.50	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX M/F	W/R	CONCESSION/FARM	GPRS REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	ELEPHANT - WITH TUSKS	M	Killed	Sengo	262530	01-AUG-2015	52cm	15,000
2	BUFFALO	M	Killed	Sengo	255508	14-AUG-2015	48"	4,000
3	ZEBRA - BURCHELL'S	M	Killed	Sengo	272814	03-AUG-2015		400
4	ZEBRA - BURCHELL'S	M	Killed	Sengo	259641	03-AUG-2015		2,000
5	ZEBRA - BURCHELL'S	M	Killed	Sengo	210708	01-AUG-2015		1,000
6	IMPALA	M	Killed	Sengo	201641	15-AUG-2015		100
7	IMPALA	M	Killed	Sengo	144831	08-AUG-2015	23	500
8	IMPALA	M	Killed	Sengo	241552	15-AUG-2015		100
9	IMPALA	M	Killed	Sengo	272852	11-AUG-2015		100
10								
11								
12								
13								
14								
15								
16								
17								
18								
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20								
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27								
28								
29								
30								

APPLICANT:

BRYAN OTTMERS

OPERATOR ENHANCEMENT REPORT

OPERATOR ENHANCEMENT QUESTIONNAIRE

1. OPERATOR INFORMATION
   a. Name of Area Operator: Zambezi Hunters
   b. Years in business: 20 +
   c. Name of Company conducting hunt: Zambezi Hunters
   d. Closest town to hunt location: Birchenough Bridge
   e. Country where hunt will take place: Zimbabwe

2. CONCESSION
   a. Name of Concession: Sango- Save Valley Conservancy
   b. Area in Km^2: Sango is 600KM2
   c. Land tenure: Title deed with, German Bilateral Investment Agreement (BIPPA)
      Government Lease Community Private Ranch X Private Conservancy
   d. Length of Concession Agreement: Privately owned land
   e. Can it be renewed? Yes N/A No
   f. Length of Renewal, if applicable: N/A
   g. Estimated total amount received in trophy fees last year, if applicable:
      $ 264 150.00
   h. Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:
      Privately owned, Sango is professionally run ecologically and has community support programs
   i. Please provide the Concession location and nearest City: Birchenough Bridge is the closest town, Mutare the closest City
   j. Please attach a map or maps with the boundaries marked and showing the nearest City
   k. If the Concession borders a National Park, please provide Park name: N/A
   l. Description of general and distinctive habitat features and any water features:
      Savanna woodland with three main rivers, Msaize, Mokoreand Save river. Granite hills in the western area of Sango

3. COMMUNITIES IN THE CONCESSION
   a. Are there any communities living in the Concession? Yes No **NO**
   b. If so, estimated number of people or villages in the Concession? N/A
   c. Are there communities bordering this Concession? Yes . **Yes** No
   d. If so, estimated number of people or Villages around the Concession? 400,000

4. RELEVANT GAME POPULATIONS IN THE CONCESSION:[1]

	RELATIVE ABUNDANCE		3-YEAR TREND	HOW IS IT

[1] The FWS Import Permit Application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species Name	Dense	Avg.	Sparse	Estimated Population	Up	Down	Stable	Monitored?
Elephant	x			600			x	Aerial survey
Lion	x			76			x	Spoor and camera trap survey
Leopard	x			115			x	Spoor and camera trap survey
Prey species	x			thousands			x	Aerial survey

5. LOCAL COMMUNITY PARTICIPATION

a. Total employment number: 130 full time staff + 8 managers
b. Please identify the number and type of all employees:

EMPLOYEE TYPE	TOTAL NUMBER OF THIS TYPE	NUMBER OF THIS TYPE WHO ARE LOCAL/FROM NEARBY COMMUNITIES
PROFESSIONAL HUNTERS	6	All Zimbabwean's
TRACKERS	10	Most are from the local community
ANTI-POACHING SCOUTS/RANGERS	44	All from local community
OTHER ANTI-POACHING		Sango hosts the Save Valley Special Species anti-poaching unit
COOKS/HOUSEKEEPERS	20	All from local community
COMMUNITY COORDINATORS	NA	
MANAGERS	8	All Zimbabwean's
BIOLOGISTS	1	English Ecologist
OTHERS:	50	

6. 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:

EMPLOYEE TYPE	TOTAL NUMBER OF THIS TYPE	NUMBER OF LOCALS /FROM NEARBY COMMUNITIES	WHEN EMPLOYED?
ANTI-POACHING STAFF	44		
MANAGERS	8		
MAINTENANCE	12		
ROAD OPENING /CONSTRUCTION	13		
COMMUNITY RELATIONS PERSONNEL	1		
OTHERS:	60		

7. ANTI-POACHING EFFORTS:[1]

a. Number of Anti-Poaching staff: 44
b. Are Anti-Poaching Patrols conducted during the hunting season, off-season, or both?
Hunting season: Off-season: Both seasons: **BOTH**
c. Months during which Anti-Poaching Patrols are conducted: All year
d. Number of Anti-Poaching Patrols per month: +/- 370 patrols per month
e. Description of Anti-Poaching equipment, vehicles, etc.:
Full time manager with vehicle, 14 radios, 30 shotguns , uniforms , etc.

[1] 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."

7. ANTI-POACHING EFFORTS: *[CONTINUATION]*

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution?

Full time Anti Poaching Manager

g. Do you offer rewards to poaching informants leading to arrest? Yes x No

h. Do you offer rewards to poaching informants upon conviction? Yes x No

i. Please describe the company's anti-poaching expenditures below:

TYPE OF EXPENSE	SPENDING 2017	SPENDING 2018	SPENDING 2019	REMARKS
SALARIES FOR ANTI-POACHING SCOUTS			$114,200	
EQUIPMENT			17,700	
VEHICLES			20,000	
~~PETROL~~ DIESEL			9,700	
REWARDS PAID			16,200	
OTHER: _____				
OTHER: _____				
TOTALS			$178,300	

j. What currency are the expenditures given in? US dollars

8. ANTI-POACHING RESULTS:

CATEGORY	2017	2018	2019	REMARKS
POACHING INCIDENTS DISCOVERED	120	135	162	
ELEPHANT CARCASSES OBSERVED				
LION CARCASSES OBSERVED				
LEOPARD CARCASSES OBSERVED				
IVORY POACHERS ARRESTED				
MEAT POACHERS ARRESTED	120	135	162	
OTHER POACHERS ARRESTED				
POACHERS CONVICTED				
SNARES/GIN TRAPS COLLECTED				
FIREARMS CONFISCATED				
VEHICLES CONFISCATED				
BICYCLES CONFISCATED				
BOATS/NETS CONFISCATED				
TUSKS RECOVERED				
OTHER: _____				

9. COMMUNITY INVESTMENT:[3]

a. Does the Company contribute money or goods/services to local communities?
YES 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)?
N/A

c. Does the Company provide game meat to nearby communities? Yes **Yes** No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:
Sango supports school and Chiefs functions with approx. 1 200kgs meat per year

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.
N/A

f. Please describe any consolation payments made to local residents damaged by game species
N/A

g. What currency are the expenditures reported in?

SPECIES	DAMAGE CAUSED	CONSOLATION PAID 2017	CONSOLATION PAID 2018	CONSOLATION PAID 2019
ELEPHANT				
LION				
LEOPARD				
OTHER				

a. Please describe any community projects paid for by the Company:
ongoing support for 4 schools and maintain 9 boreholes approx. cost US$6,500/year

b. What currency are the expenditures reported in?

TYPE OF PROJECT	SPENDING 2017	SPENDING 2018	SPENDING 2019	REMARKS
EDUCATION (E.G.: CLASSROOMS, OFFICES)				
EDUCATION (E.G.: SCHOOL FEES, SCHOOL SUPPLIES)				
HEALTH (E.G.: CLINICS, OFFICES)				
HEALTH (E.G.: MEDICAL SALARIES, EQUIPMENT)				
COMMUNITY SCOUT SALARIES				
OTHER COMMUNITY ANTI-POACHING				

[3] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

9. COMMUNITY INVESTMENT: *[CONTINUATION]*

TYPE OF PROJECT	SPENDING 2017	SPENDING 2018	SPENDING 2019	REMARKS
LOCAL GOVERNMENT ACTIVITIES				
WATER INFRASTRUCTURE IMPROVEMENTS				
SPORTS TEAMS FUNDED				
CONSTRUCTION MATERIALS DONATED				
OTHER: _____				
OTHER: _____				
TOTALS				

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	HUNTING ELEPHANT		HUNTING LION		HUNTING LEOPARD		HUNTING ALL SPECIES	
NUMBER OF U.S. CLIENTS	2017:		2017:		2017:		2017:	
	2018:		2018:		2018:		2018:	
	2019:	3	2019:	1	2019:	4	2019:	16
PERCENTAGE OF U.S. CLIENTS	2017:		2017:		2017:		2017:	
	2018:		2018:		2018:		2018:	
	2019:	100%	2019:	100%	2019:	100%	2019:	75%
TROPHY FEES PAID BY U.S. CLIENTS	2017:		2017:		2017:		2017:	
	2018:		2018:		2018:		2018:	
	2019:	58 500	2019:	25 000	2019:	30 000	2019:	150 650

11. Approximate Dollar amount and/or percentage of Company's revenue from U.S. Clients: $ 208 600

12. OTHER INFORMATION: Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies (e.g.: aging, size, resting areas), Concession Improvements (e.g.: digging and maintaining boreholes, restocking), Management Activities, Research, etc.
[USE SEPARATE SHEET]

13. I declare that the foregoing is true and correct:

Sango - Save Valley Conservancy — CONCESSION NAME
TELEPHONE: +263 773098829
EMAIL: natalie@cranesafaris.co.zw

NATALIE EDWARDS - CRANE SAFARIS — OPERATOR – FULL NAME (PLEASE PRINT)
Mrs — TITLE

Edwards — SIGNATURE

www.cranesafaris.co.zw — OPERATOR WEBSITE

CRANE SAFARIS (PVT) LTD
P.O. BOX MP 852
MOUNT PLEASANT, HARARE
TEL: 0242- 745 460

Natalie Edwards <natalie@cranesafaris.co.zw> 7/24/2020 6:03 AM

RE: Elephant Lawsuit Case No. 19-CV-3696 - Sango Information

To Aimee Korver <permits@conservationforce.org>

Dear Aimee,

Please find attached the enhancement questionnaire answered to the best of our ability. Crane Safaris took over as Operator for Sango in 2019. I don't have any financial data for Zambezi Hunters for years 2017 and 2018. I hope that this will aid your case.

If I can be of further assistance please do not hesitate to contact me.

Please may you confirm receipt of email.

Kind Regards,

Natalie
Administrator
Crane Safaris
P. O. Box MP 852
Mount Pleasant
Harare

Mobile: +263773098829
Landline: +263242745460

Website: www.cranesafaris.co.zw

From: Aimee Korver
Sent: Thursday, 23 July 2020 21:10
To: Natalie Edwards
Subject: Re: Elephant Lawsuit Case No. 19-CV-3696 - Sango Information

Natalie,

APPLICANT:

BRYAN OTTMERS

SAVE VALLEY CONSERVANCY: LETTER ON TROPHY HUNTING

SAVÉ VALLEY CONSERVANCY
P.O Box M13
Mabelreign
HARARE

admin@savevalleyconservancy.org
www.savevalleyconservancy.org

Mr. John J. Jackson
Conservation Force
Metaire, Louisiana
USA

Sent by email

Subject: Trophy hunting in the Savé Valley Conservancy, Zimbabwe

Dear Mr. Jackson

The purpose of this letter is to support the many safari operators, Professional Hunters, and international clients who hunt in the Savé Valley Conservancy (SVC) by explaining how hunting, conservation, and community assistance work hand in hand under the umbrella of the SVC to support a vital wildlife resource. It is my hope that this message can be communicated to the US Fish and Wildlife Service by yourselves and/or safari operators in support of trophy import permits for animals hunted in the Conservancy.

Background

The Savé Valley Conservancy is located in southeastern Zimbabwe along the Save River which runs along its eastern boundary. The Conservancy originally consisted of 24 adjacent properties aligned since 1992 under a constitution which commits its property-owning Members to the wise management of ecological resources and wildlife within its boundaries. In spite of resettlement during Zimbabwe's Land Reform Program, 18 properties are operational today and we protect wildlife and its habitat on over 700,000 acres. The SVC is designated to become part of the Greater Limpopo Trans Frontier Conservation Area, an international Peace Parks initiative linking national parks and conservation areas in Zimbabwe, South Africa, and Mozambique.

The SVC is home to many rare and endangered species. Our professional husbandry has protected and grown all species but specifically including:

202 black and white rhino (75% black) grown from a starting population of 42
2700 elephants, grown from a starting population of 560
~400 lions

158 African Wild Dogs, the densest population in Africa
1448 giraffe

In addition we have healthy but partly measured populations of ~ 400 leopards, an estimated well over 100 pangolin, hundreds of insects as well as reptile species, and well over 400 bird species, including many species of vultures and raptors.

Role of Trophy Hunting

The economic underpinning of the SVC that makes landscape scale conservation possible is well monitored and sustainable trophy hunting carried out by individual Members on their properties. Each property works with different safari operators and Professional Hunters. A large majority of hunting clients who come to the SVC each year are from the United States and it is vital to the SVC that they be allowed to import their trophies into the US. Trophy income is derived from hunting a small percentage (<5%) of mostly older male members of a given species and funds the growth and protection of entire populations. Trophy hunting is the basis of exceptional wildlife growth rates in the SVC, allowing us to relocate excess animals to repopulate national parks.

Income from trophy hunting is almost entirely devoted by Members to fence maintenance, game scouts and anti-poaching, maintenance of roads and firebreaks, operation of pipelines and water points for wildlife, and community assistance. In other words it covers from 60 – 100% of the costs of successful wildlife conservation. The cost of maintaining and protecting the wildlife resource is, on average, US$9 per acre annually. Conservancy Members assist the communities that surround the Conservancy in many ways: building schools and clinics, drilling boreholes, creating irrigation schemes, providing books, computers, and scholarships as well as jobs and protein.

Members pay levies to the Conservancy to support a small staff which manages programs that allow central management of wildlife and quota setting, recognizing that wildlife on any one property are part of one population living within Conservancy boundaries. Conservancy management programs include an annual aerial survey of the Conservancy wildlife population, allocation of sustainable off-take quotas to individual Member properties, and trophy quality monitoring. The SVC supports outside research on key species management issues and handles large scale relocation of excess animals when over-populations stress the Conservancy's habitat and carrying capacity. In 2018 we relocated 100 elephants. In 2020, we will relocate another 600 elephants, about 2,500 plains game animals, two prides of lions, and at least one pack of wild dogs to Zimbabwe's national parks. This is a clear win-win for all parties involved and an operation which would be infeasible without sustainable trophy hunting.

With donor support the Conservancy spends over US $500,000 annually to manage, employ, and equip 56 highly trained and professionally led scouts who form a Special Species Protection Unit (SSPU) that protect our large population of rhino. The SSPU is in effect a security overlay which operates in conjunction with, and in support of, separate anti-poaching scout teams employed by Members. The success of the SSPU is attested by the positive growth rates in our black and white rhino populations (see attachment.)

Conclusion

Again, I am writing on behalf of the many safari operators, PH's, and international clients who hunt in the Savé Valley Conservancy. Without trophy hunting, there would be no Conservancy. The SVC is in an arid region where wildlife and associated tourism are a preferred land use. Indeed, the decision by founding Members of the SVC to change land use to wildlife and form the Conservancy was driven by repetitive droughts that proved cattle ranching, the prevailing land use, was uneconomical and ecologically unsound.

I ask that you support the importation of trophies harvested by US clients in the Savé Valley Conservancy. Doing so protects a large natural landscape and far more species than just those which are hunted in sustainable and low numbers.

Sincerely yours,

Weldon Schenck
Chairman, SVC

Attachments

Trophy monitoring results and procedures
SVC

SVC Lion Management Plan
Dr. PJ Funston, December 2011

SVC Management of the Elephant Population
Rowan Martin, January 2007

Predator Spoor Report
African Wildlife Conservation Fund 2019

Rhino reports
Josie Hosker Independent Rhino Monitor, January 2020

Elephant Collaring in SVC

Giraffe Monitoring and Collaring in SVC

Mokore Community Outreach
An example of one Member ranch's community outreach program 2019

APPLICANT:

BRYAN OTTMERS

SAVE VALLEY CONSERVANCY: MANAGEMENT OF THE ELEPHANT POPULATION

Savé Valley Conservancy

Management of the Elephant Population

Rowan B. Martin

January 2007

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Acknowledgements

I thank David and Graeme Cumming, Kevin Dunham, Mike Jones, Alistair Pole, Fay Robertson, Clive Stockil, Roger Whittall and all of the Savé Conservancy members for valuable discussions which have helped me clarify my own thoughts on managing the elephants.

Introduction

The terms of reference for this study required the consultant to –

- review the options for the management of elephant in the Savé Valley Conservancy (SVC);
- assess the ecological, economic and social implications for the various management options, concentrating on those deemed relevant for the SVC;
- make recommendations on the best management options for the SVC; and
- present the report to the SVC members at the annual quota meeting planned for early December of this year, 2006.

In a review of the elephant research programme in the Savé Valley Conservancy last year (Martin 2005c), I took note of the responses to a questionnaire administered by Anderson (2005) on the aspirations and wishes of the members of the SVC regarding the elephant population and the information has been used to guide this study. The management recommendations made in the course of that review are presented in **Appendix 1** (page 34) and do not differ greatly from those contained in this study.

This study builds upon the preliminary modelling done in the original review with an emphasis on the financial values attached the various management options. The work adds considerably to understanding the population response to management actions. The Savé Valley elephants fall in the category of a 'small population' with an irregular age structure and this gives rise to some unexpected outcomes.

This report should have been completed before the annual quota meeting held in the Conservancy on the 5th December 2006. I found myself in a situation shortly before the meeting where I could complete either the report or the presentation of the results but not both and, with the agreement of the Technical Advisory Committee, it was decided to focus on the presentation. With hindsight, this was probably a good choice because the presentation led to a stimulating discussion of the issues and resulted in a management decision being taken which needed further analysis. The meeting also made me acutely aware of the practical issues which would arise in trying to implement the management actions – particularly with regard to population reduction and setting hunting quotas – and I believe I have now addressed these aspects.

The modelling work has been very, very interesting. It may have added to the understanding of the population dynamics of 'small elephant populations' not just for Savé but in general. The methodology is equally applicable to large populations but copes with the peculiar situations which arise when there are only small numbers in each age class and none at all in some age classes. It also deals with the inherent time lags which are implicit in the response of a population of long-lived animals to various management treatments. The method of quota setting which has been developed in this study is, I believe, the first time a classical control system has been practically applied to elephants (and perhaps any large mammal species).

The study has generated copious amounts of data and it would be very easy to spend several months including all the results in the final write-up. However, the report is overdue and I shall confine myself only to the most relevant findings – particularly those which pertain to the decision taken at the December meeting.

The Issues

A rapidly increasing elephant population

With no management intervention, the Savé Valley elephant population would theoretically reach some 8,000 animals by the year 2050 (**Appendix 2**, page 36). However, it is highly likely that a drought or illegal hunting would act to limit the population before this. The population exceeded 0.3 elephants/km^2 in 2003 – the density at which vegetation damage becomes markedly noticeable (Cumming, *pers.comm.*).

Elephants and habitats

A large body of literature exists, much of it from work done in Zimbabwe, that habitats are significantly modified when elephant densities exceed fairly low thresholds (Anderson 1973, Barnes 1983 & 1985, Laws, Parker & Johnstone 1975, Murindagomo 1992, Swanepoel & Swanepoel 1986, Thomson 1975). Coulson (1992) showed that when elephant densities reach 0.5/km^2 the expected loss of mature *Acacia tortilis* tress was about 60%. Craig (1992) predicted that elephant densities exceeding 0.3/km^2 would result in a 50% loss of *A. tortilis*, a 70% loss of *Brachystegia boehmii* and a 40% loss of *Baikiaea plurijuga*. Martin (1974) showed that even before the loss of the dominant canopy trees in *Brachystegia* woodland became noticeable, numerous sub-dominant tress and shrubs had disappeared or become greatly modified. Martin (1992) estimated that to retain a full canopy tree cover in *A. tortilis*, *B. boehmii* and *B. plurijuga* woodlands required elephant densities less than 0.2, 0.1 and 0.3/km^2 respectively. Robertson (1993) states that *Brachystegia* woodland did not survive later than the 1970s in any protected area of Zimbabwe where elephant density during the dry season exceeded 0.5 /km^2 and that regrowth will not progress beyond wooded grassland when elephant density exceeds 0.2-0.5/km^2. Cumming (*et al* 1997) examined elements of biological diversity in the lower Zambezi Valley and showed that biological diversity was lower in the State protected areas than outside them – largely due to the presence of high densities of elephants acting in combination with fire.

The arguments are compelling for limiting elephant densities in Savé Valley to a level not much higher than they are at present (i.e. well below 0.5/km^2). Almost all respondents to the questionnaire survey stated that a diversity of animals and plants was of the highest importance to them (Anderson 2005, section 2.6, page 9) and this goal will undoubtedly be compromised if elephant are allowed to increase much beyond their present levels.

Inter-specific competition

A population of any species is effectively competing with another species if it eats any of the food required by that species (Sinclair 1974)

The south-east Lowveld of Zimbabwe is a semi-arid area with limited carrying capacity for both domestic livestock and wildlife. Allowing elephants to take up most of the available carrying capacity must inevitably have a negative impact on the other large mammal species in the Conservancy. Of these species, buffalo are more valuable to the Conservancy than elephants – providing at least one-third of the annual income from safari hunting. To create the 'space' for other more valuable species to expand means ensuring the elephant population takes up no more than its theoretical 'share' of the available resources.

Relationships with neighbouring communities

The Savé Valley members have recognised the importance of maintaining good relationships with the communal lands bordering the Conservancy. A Trust has been established to conduct all the 'corporate level' business of the Conservancy and the shareholding in the Trust includes all SVC landholders and 18 communal land wards with contiguous boundaries (10% shareholding).

The elephant population in the Conservancy offers a significant potential to benefit these communities since all income from culling operations and trophy fees accrues to the Trust. Equally, the elephants could be perceived negatively if the only experience communal land residents have of them is in the form of crop raiding problem animals. The areas surrounding the conservancy are poor and protein-starved – which inevitably gives rise to illegal hunting in the Conservancy for survival needs. A circular communication from Dr. Peter Lindsey who is advising the SVC on social issues (**Appendix 3**, page 37) highlights the problem and the opportunities which an elephant cropping programme could present.

Barrett & Arcase (1995) have criticised the concept of passing benefits to neighbouring communities from areas where wildlife is protected, stating that the practice raises unwarranted expectations and can lead to a positive feedback spiral. Hopefully this situation can be avoided in the SVC because the neighbouring communities are genuine stakeholders.

CITES

Elephants are listed on Appendix I of the Convention on International Trade in Endangered Species of Fauna and Flora. Although Zimbabwe entered a Reservation at the time of the listing, its ivory cannot be traded on the international market because of an absence of potential importing countries with similar Reservations. This significantly reduces the income which should accrue to the stakeholders in the SVC Trust – including local communities. Far from contributing to the conservation of elephants, the ivory trade ban reduces the incentives for sustaining the species. It would be rational for the members of the Conservancy to place their management emphasis on enhancing other wildlife species which are more valuable.

The SVC has the option of storing its ivory until legal markets are opened or trading the product in defiance of CITES. The latter option can be legally achieved simply by the granting of an import permit endorsed by the CITES Scientific and Management Authorities of the importing country to the effect that they believe that the transaction is in the interests of conservation of the species. The Scientific and Management Authorities of the exporting Party (Zimbabwe) would state on the export permit that the ivory had been obtained in a manner that was not detrimental to survival of the species and in accordance with the laws of the country. Interpreting the Convention strictly, the importing country should also have entered a Reservation at the time of the listing of the elephant on Appendix I – however, there is no action that could be taken against the exporting or importing country under the CITES Treaty should they decide to grant such permits.[1]

1. Advice from PeterDollinger, the CITES Scientific Authority for Switzerland (the CITES depositary country).

Complex systems

The ecological, economic and social issues surrounding the management of elephants in the Savé Valley Conservancy can be considered a Complex System (Holling 2001 – a resumé of this paper is given in **Appendix 4**, page 38). The **Adaptive Cycle** is shown in **Fig.1** below.

Ecological, economic and social systems have a tendency to build up 'capital' to the extent that they become brittle and have low resilience (the "conservation" stage in Fig.1). They are then likely to crash, releasing their accumulated wealth, and a period of re-organisation then follows where new capital begins to appear. This is followed by another phase of exploitation. The timing of these various phases is not uniform and the so-called cycle may not conform exactly to the shape shown in Fig.1.

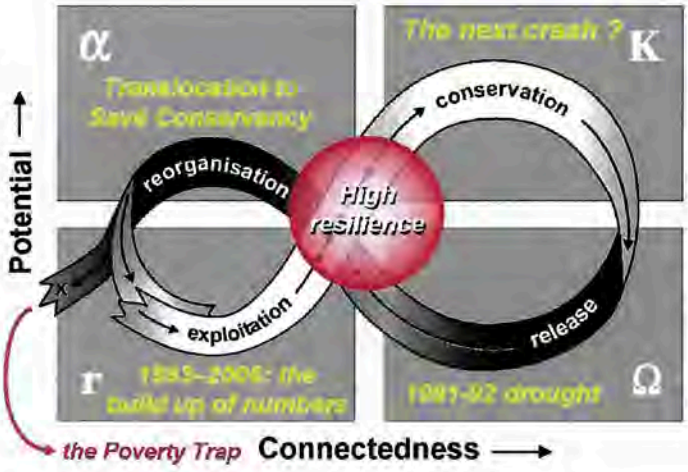


Figure 1: The Adaptive Cycle

In savanna ecosystems, if the 'crash' results in severe depletion of vegetation and soil erosion, the cycle may be unable to repeat itself and the system is caught in a so-called "poverty trap" – which could happen if the elephants in Savé were allowed to increase to a high population density.

The life history of the elephants in Savé Conservancy shows a remarkable conformity with the adaptive cycle concept. The elephant population in Gonarezhou National Park was relatively high in 1991 (over 5,000 animals) and a severe drought precipitated a population crash. Over a thousand elephants died in the park and some were translocated to Savé Conservancy. This can be seen as period of reorganisation and, if the principle is accepted that humans are an implicit component of a "panarchy", then the fact that the translocation was not a spontaneous act of the elephants is neither here nor there. The relocated elephants established themselves in the Conservancy and began to increase in numbers after 1992 to the point where their present density is once more a matter for concern.

If management interventions are now made to prevent an increase in the population, it is apparent that the elephants will be contained in the rapid growth phase of the adaptive cycle where resilience is high (see figure). The question arises whether, by holding the elephant population in this state, the resilience of either the elephant population or the ecosystem might be reduced. It seems unlikely that it would have a damaging effect on the elephants but it is possible that some other components of the ecosystem could be adversely affected.

The dangers of attempting to hold a species population at some constant level (or conversely attempting to maintain a constant harvest from it) have been well-documented. Walker (1989) points out –

> ***"The most complex and desirable ecosystems that we wish to conserve are markedly unstable (non-constant), and achieving our conservation goals depends on their remaining that way. It is the continued instability of these systems which allows for the coexistence of their many species, whether or not the systems have strong internal regulation. ... Unfortunately, conservation management is often intuitively opposed to this."***

Owen-Smith (1989) points out the conservation dilemma which this imposes on African ecosystem managers. Frequently, large mammal populations increase in numbers to the point where they are destroying their habitats and reducing biological diversity: at the same time, attempts to regulate such populations at constant levels may hold equal conservation dangers in the long term. Successfully holding populations at the selected "carrying capacity" may entail a stasis which is unfavourable for certain other species in the ecosystem, reduces resilience and ends up in the pathology defined by Holling (1993).

> ***"In many cases of renewable resource management, success in managing a target variable for a sustained production of food or fibre leads to an ultimate pathology of more brittle and vulnerable ecosystems, more rigid and unresponsive management agencies and more dependent societies ..."***

This all points towards a need for imaginative and innovative management. Routine cropping programmes which attempt to impose constancy on naturally fluctuating ecosystems should be closely monitored and, if necessary, an element of randomness may need to be introduced into the programme or major alterations in direction made at short notice. The present situation where Savé Conservancy is obliged to submit management plans to the government wildlife agency at the beginning of each year removes the flexibility needed to make sudden changes and reduces the adaptive capacity of managers (Martin 1999b).

The challenge is to make the management sustainable and to do this requires an adaptive management approach. Without experimenting, the resilience question is impossible to answer.

Members' wishes

Elephant densities for properties in the south of the conservancy appear to be higher than those in the north. Most properties in the south would like to see a reduction in densities and most properties in the north would prefer an increase. **This is the first conflictive situation which an elephant management programme would have to address. The second is the desire of some property owners engaged primarily in safari hunting for greater numbers of elephant so that the quota of trophy bulls can be increased.** Both of these concerns are addressed in this study.

All survey respondents accepted that ultimately there will be a need to control elephant population numbers (Anderson 2005, Section 6.3, p35). If this is the case, then **the only question is when ?** Although a number of respondents to the questionnaire did not view the impact of elephants on habitats as particularly serious when answering section 3 (*Perceived elephant contributions and impacts*), the impression is given in section 4.2 (*Elephant impact at habitat level*) that concerns may be higher than the earlier statements suggest.

At the meeting held in the Conservancy on 5th December 2006, the members decided unanimously that the elephant population should be gradually reduced by an offtake of 50-100 animals per year until it is below 1,000 animals. It should be maintained below 1,000 animals by a sustainable annual offtake.

A key consideration in reaching this decision was the need to benefit the communities neighbouring the Conservancy. A strong preference was expressed that **the culling offtakes should result in a continuous flow of benefits** rather than a large windfall as would arise from a major population reduction.

Savé Valley Conservancy is not a national park – **it is a bold experiment in wildlife management as a land use. The primary concern of members must lie in development.** The use of land should be viable, should outcompete alternative land uses and must be sustainable. Conservation will be achieved as a byproduct of the quest for sustainability.

Elephants are a valuable resource which could contribute significantly to the development of the Conservancy – but they also have the potential to threaten its sustainability.

Characteristics of the Elephant Population

The Savé Valley conservancy covers an area of some 3,400km^2 of which about 840km^2 (25%) is not being operated commercially at the moment due to the disruptions caused by the Fast Track Land Resettlement Programme. However, elephants have access to this additional area. The area was once populated by a substantial elephant population but the majority were eliminated in the 1950s during a major campaign against Foot-and-Mouth disease in order to make land available to cattle. The cattle industry failed to fulfil expectations and resulted in significant land degradation – with the result that farmers are now restoring the wildlife populations. The area is semi-arid with an annual rainfall varying from 300-500mm.

Surveys in 2004 and 2005 counted 1,276 and 1,201 elephants in the conservancy implying an overall density of about 0.36 elephants/km^2. Using the data of Mockrin (2000, table 1),[2] I have constructed a starting population of 592 animals in 1993 for use in the population model described below. I have not followed the age class allocations of Mockrin for the large introductions – preferring rather to assume that these would have had the age structure of the parent population from which they were captured. Where no data exist for ages and sexes of other groups introduced, they have been allocated to age classes either using random numbers or qualitative information.

Martin (2000) developed a general population model for elephants which has been used in several consultancies (e.g. Martin 2005a). The model behaves in a manner similar to the Leslie matrix (Leslie 1984) but the calculations of births and deaths are separated into successive operations because it is designed to cycle within the row operations of a computer spreadsheet. This model is extremely detailed and permits testing of expected breeding performance and the response to various management regimes (illegal hunting, culling, capture of live animals, problem animal control and sport hunting). It costs all management activities and estimates the income from ivory, elephant skin and sport hunting. Several modifications have been made to the model for specific application to the Savé Valley elephant population –

(1) The start-up population is a best estimate of the numbers and age structures of the elephants introduced to the Conservancy in 1992-93 and includes a small population which was resident in the Conservancy.

(2) The model deals with the analytic problem of small numbers of animals in each age class. Random numbers are used to select the animals required when fractions arise from percentage offtakes for natural mortality, illegal hunting, sport hunting and culling.

(3) Management regimes can be entered into the model, e.g. hunting and culling can be programmed to begin in specified years and to alter at a later stage.

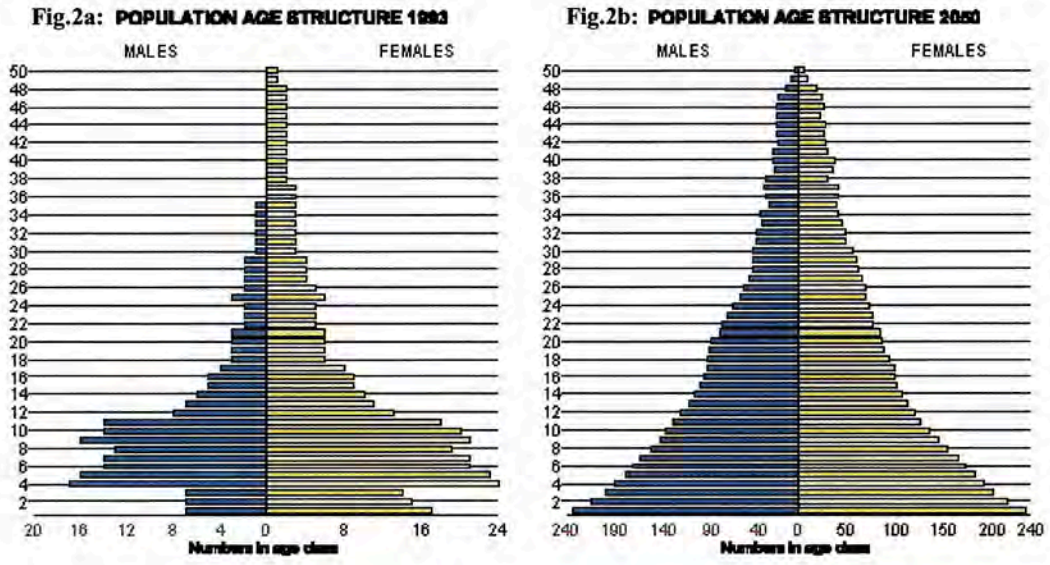
(4) The model contains a unique automatic hunting quota setting feature based on classical control system theory.

A brief description of the model is contained in **Appendix 5** (page 40). The model is available to the Conservancy as part of this consultancy.

2. This table includes all introductions of elephant to the conservancy beginning in 1982 and takes into account animals which escaped and animals which died soon after introduction. To these I have added the estimated 10 animals which remained on Humani Ranch after the main population was eradicated in 1971-72.

Elephant numbers and population growth rates

The Savé Valley elephant population has not yet achieved a stable age structure and will not do so until the year 2050 (**Figs 2a** & **2b** below). Knowledge of the rate of growth of the population in any particular year before this is of limited value – it can be expected that the growth rate will be higher than 6% in some years before it achieves a stable age structure. However, in the absence of any management, the rate of growth will eventually stabilise at about 4.5% (**Fig.3**).



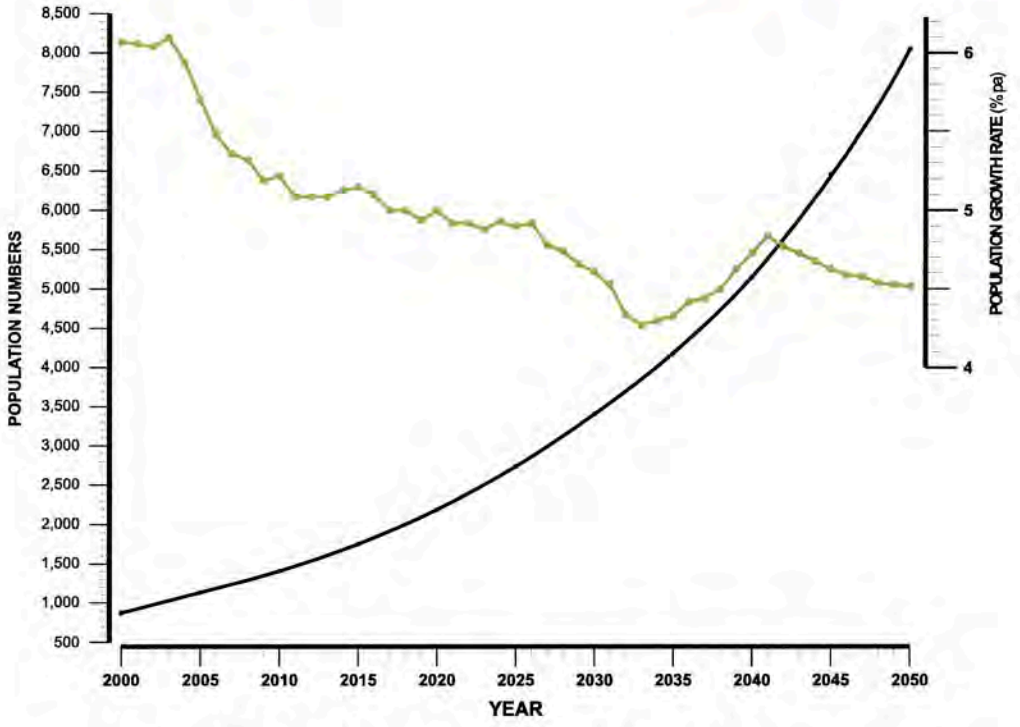


Figure 3: Population numbers and growth rates

Elephant biomass

In a recent study done in the Caprivi, Martin (2006) used the relative contributions of ungulate species to sport hunting income in relation to their metabolic biomass to establish an 'optimum' population size for elephant (**Appendix 6**, page 44). In relation to the income that they earn and the amount of resources they consume, elephants ranked 23rd in value in a list of 27 ungulate species. Buffalo are by far the most valuable species contributing about one-third of the total income from sport hunting.

The management tools available to enhance the status of the more valuable ungulate species are limited but one obvious way is to ensure that inter-specific competition for resources is not constraining the growth of populations. In a number of other rare and valuable species studies in Namibia [Buffalo (Martin 2002); Roan, Sable & Tsessebe (Martin 2003); Reedbuck, Waterbuck, Lechwe & Puku (Martin 2004); Elephants (Martin 2005a) and Hippo (Martin 2005b)] it was emphasized that the increasing elephant population was a both a direct and indirect threat to other species. To create the 'space' for other more valuable species to expand means ensuring the elephant population takes up no more than its theoretical 'share' of the available resources. To achieve this in the Caprivi, **the metabolic biomass of elephants should not exceed more than 25% of the available carrying capacity** (Appendix 6).

The metabolic biomass for various sizes of the elephant population in Savé Valley Conservancy are given in **Table 1** below –

Table 1: Metabolic biomass and elephant population size

Weight of an average individual in the population (kg)	2,100
Metabolic biomass = $(Wt)^{0.75}$	310
Metabolic biomass (Livestock Units)	3.18

	METABOLIC BIOMASS (Livestock Units)			Stocking rate
Population	Males	Females	Total	hectares / LU
750	1,109	1,218	2,327	146
1,000	1,537	1,573	3,110	109
1,250	1,975	1,806	3,781	90
1,500	2,501	2,280	4,781	71
1,750	2,815	2,514	5,329	64
2,000	3,312	2,887	6,199	55
2,250	3,636	3,204	6,840	50
2,500	4,127	3,549	7,676	44

At a stocking rate of 1 livestock unit/20 ha the available carrying capacity for the Conservancy is about 17,000 LUs. Applying the criterion that the elephant population should not exceed 25% of this implies **a maximum population of about 1,300 elephants.**

Illegal hunting

Illegal hunting is assumed to affect both sexes and all age classes equally. The effects of increasing offtakes on population growth is shown in **Fig.4** below. The population can sustain offtakes of up to 3.75% per annum. Higher percentage offtakes result in a population decline but, because the offtake declines with the population size (being a percentage), the decline is not rapid (e.g. in the year 2100 under an offtake of 4% the population will decrease to 873 animals; 4.25% – 673 animals; 4.5% – 530 animals).

It is more realistic to examine unsustainable illegal hunting in terms of fixed offtakes. For the scenario shown where illegal hunting begins in 2004, the maximum fixed offtake which can be sustained is 47 animals. For higher offtakes, the year in which extinction occurs is shown below.

Fixed offtake	48	50	60	70	80	90	100	animals
Extinction	2108	2075	2041	2031	2025	2021	2020	year

In theory, a population capable of growing at 4.5% per annum should be able to sustain an offtake of 4.5% if it is applied evenly to all age classes: in practice, the limitations of a 'small population' preclude this. Because whole numbers have to be removed, rounding effects dictate that the maximum offtake must be lower than the theoretical maximum. This is not simply an artefact of the modelling process but a syndrome which would affect the real population.

In all population simulation runs in this study a fixed illegal offtake of 5 animals is included.

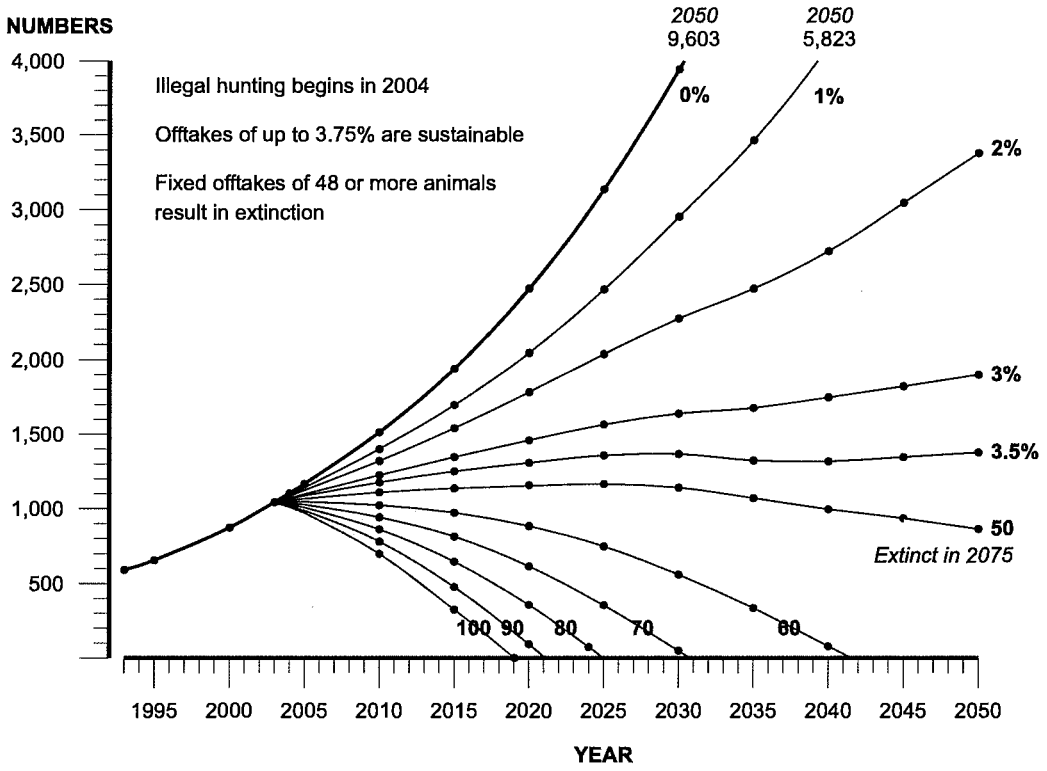


Figure 4: Effects of illegal hunting on population numbers

Problem animal control

The Conservancy's main concern is the negative effect of Problem Animal Control (PAC) on trophy hunting. Problem animals are not directly subtractible from the trophy quota because they are drawn from a wider pool of males than are sport hunting trophies. Two scenarios have been simulated (**Fig.5** below). The first is the unmanaged population (no culling) and the second is a 2.9% annual cull[3] . The modelling conditions are –

(1) The starting population in 1993 is that shown in Fig.2 (page 8);

(2) PAC runs from 2003;

(3) PAC affects males aged 15 years and older with equal likelihood;

(4) For both the relationships in Fig.5 automatic quota setting is in place (see **Appendix 8**, page 56) to regulate the mean tusk weight from trophy hunting at 20kg.

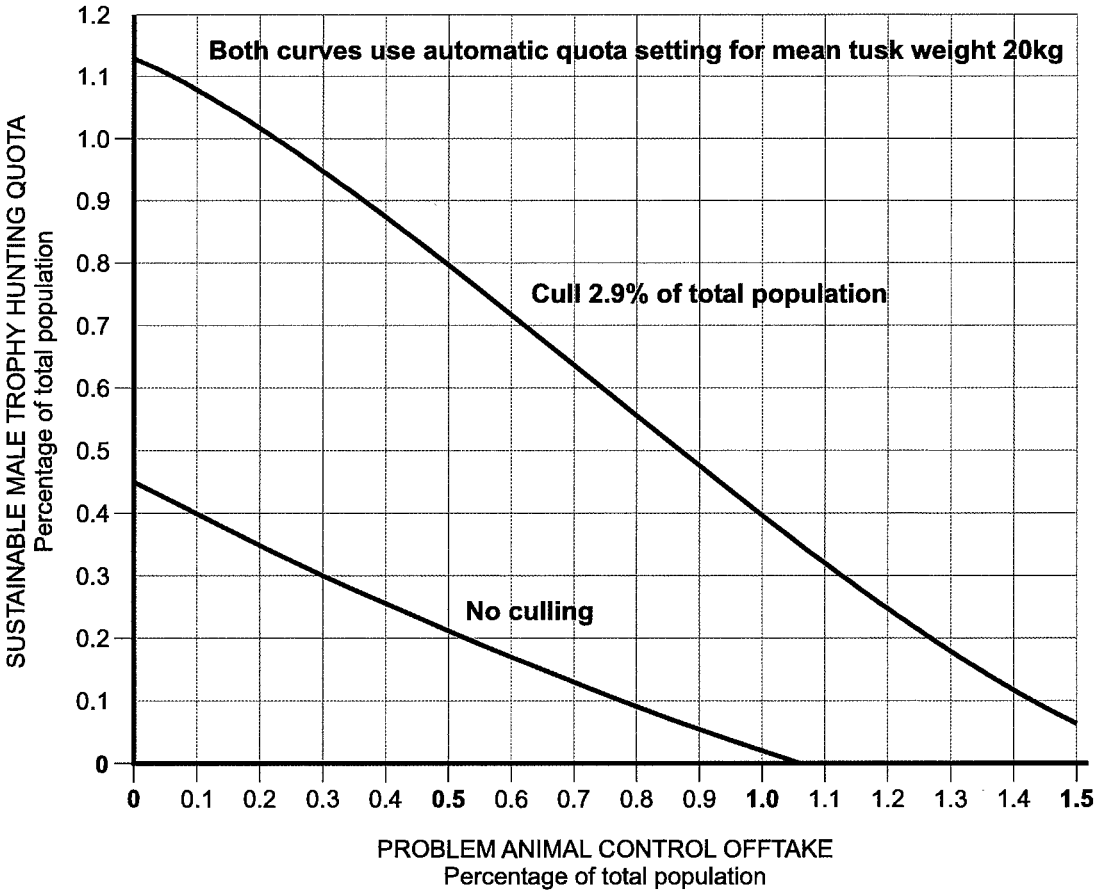


Figure 5: Relationship between Problem Animal Control and Trophy Hunting

3. With this culling percentage applied in 2007, the population increases from about 1,200 animals at the start to about 1,400 animals in 2033 and the declines slowly to about 900 animals in 2200.

The negative effects of PAC are much greater for the unmanaged population than the culled population. With zero PAC offtake, the sustainable quota to achieve a mean tusk weight of 20kg is 0.45% in the unmanaged case and 1.13% when culling is in place. If the level of PAC rises to 0.5% of the total population, the sustainable trophy hunting quota drops to about 0.2% of the population in the unmanaged case and 0.8% when culling is in place. The potential for sport hunting becomes zero at PAC levels of 0.7% and 1.4% respectively.

The past history of problem animal control outside Savé conservancy would suggest that it is an ongoing process and allowance should be made for it in quota setting. A fixed offtake of 5 animals (0.5% of a population of 1,000) has been incorporated into all of the modelling scenarios which follow.

Trophy hunting

The relationship between tusk size and age for elephants is shown in **Fig.6** below (based on Pilgrim & Western, 1986). Male elephants achieve a tusk size of about 15kg (each side) when they reach 30 years old and this has been taken as the minimum age for trophy hunting in the population model. There is a significant scatter in tusk weights for any given age (a 20% scatter is shown in the figure but the variability may be even higher than this).

In the population model, tusk weights are calculated for age class and the overall mean tusk weight for any given hunting season is the average of these data.

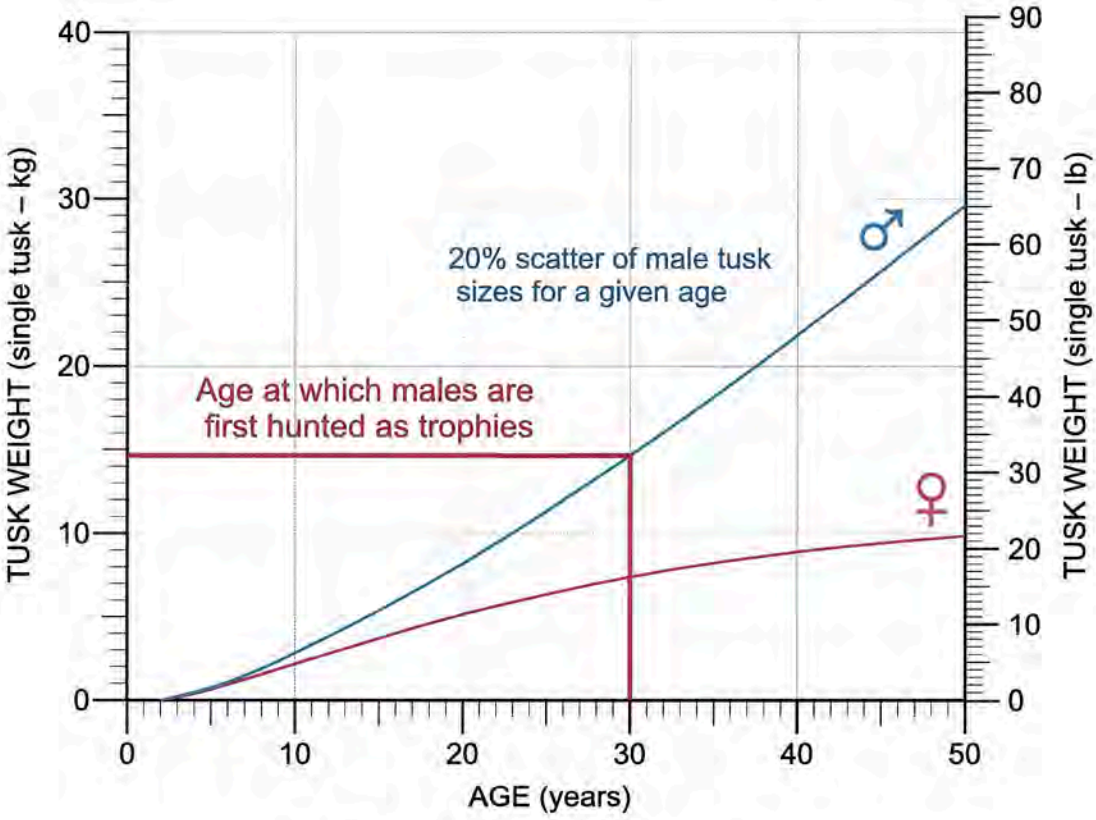


Figure 6: Tusk weight versus age

Some members have expressed the wish that the population might be managed to produce the odd male with 80lb tusks.[4] It will be observed that the mean tusk weight for the oldest age class (50 years) is only 65lb a side. There is a large scatter of different tusk sizes for any given age and it is quite possible that, although the mean tusk weight for a 40 year old animal is 48lb a side, there will be some 40 year olds which reach considerably higher tusk weights – perhaps even 80lb.

Built into the population model is a facility to specify the selectivity of trophy hunting – ranging from 100% selectivity where the animals are eliminated strictly in order of age beginning with the oldest – to zero selectivity where every male older than 30 years has an equal chance of being killed. The effects of levels of hunting from zero to 0.5% of the population are shown in a set of diagrams in **Appendix 7** (page 48).

A method of quota setting for male elephant hunting has been developed in the course of this study which automatically sets the optimum quota for each year based only the desired trophy size and the record of past mean tusk weights (**Appendix 8**, page 56). The method maintains a specified mean trophy weight regardless of the size or age structure of the population to which it is applied but it is particularly useful for small populations (less than 1,000 animals) with an uneven age structure. The effect of applying this method of quota setting to an unmanaged population to achieve a constant mean tusk weight of 20kg is shown in **Fig.7** on the next page.

Trophy hunting quotas can be substantially increased once the population is being subjected to culling. This is demonstrated in the final subsection **Culling and Hunting** (page 19).

The subject of hunting elephant females was raised by two respondents in the questionnaire survey (Anderson 2005, section 6.3, page 36) – particularly if culling were to take place. The effect of hunting females (with culling in place) has been tested in the model and there are no technical reasons why a portion of the culling quota should not be marketed for cow hunting. Some caveats are necessary. Trophy cows were hunted in Chirisa Safari Area in the 1980s and it took no more than a few years before all cows carrying large tusks were eliminated from the population. This could have implications for male trophy hunting, since the genes for large male tusks are carried by both males and females.

Cow hunting carries several other negative implications. The classic practice of removing complete cow herds has the beneficial effect of placing no selective pressures on the female portion of the population age pyramid. Trophy hunting will eliminate the older age classes and the long term effects of this selection are difficult to predict – it could affect the body of knowledge carried within the elephant population or, as stated above, result in a decrease in male trophy quality. The removal of an adult female from a herd undoubtedly carries with it considerable trauma for the surviving animals. If Savé Conservancy wishes to win friends and influence people, then the practice of cow hunting is very likely to produce more enemies than culling will – particularly as the numbers to be culled to limit the population are fairly small.

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4. It may be of interest to note that while the net value of a mature elephant male as a sport hunting trophy is about US$20,000, its commodity value would be even higher if markets were operating for the sale of ivory. A 48 year old male with a pair of tusks weighing 28 kg each produces ivory worth US$35,000 and, with the value of skin (114kg worth US$600) and meat (1,700kg worth US$1,700), the commodity value of the animal is over US$37,000.

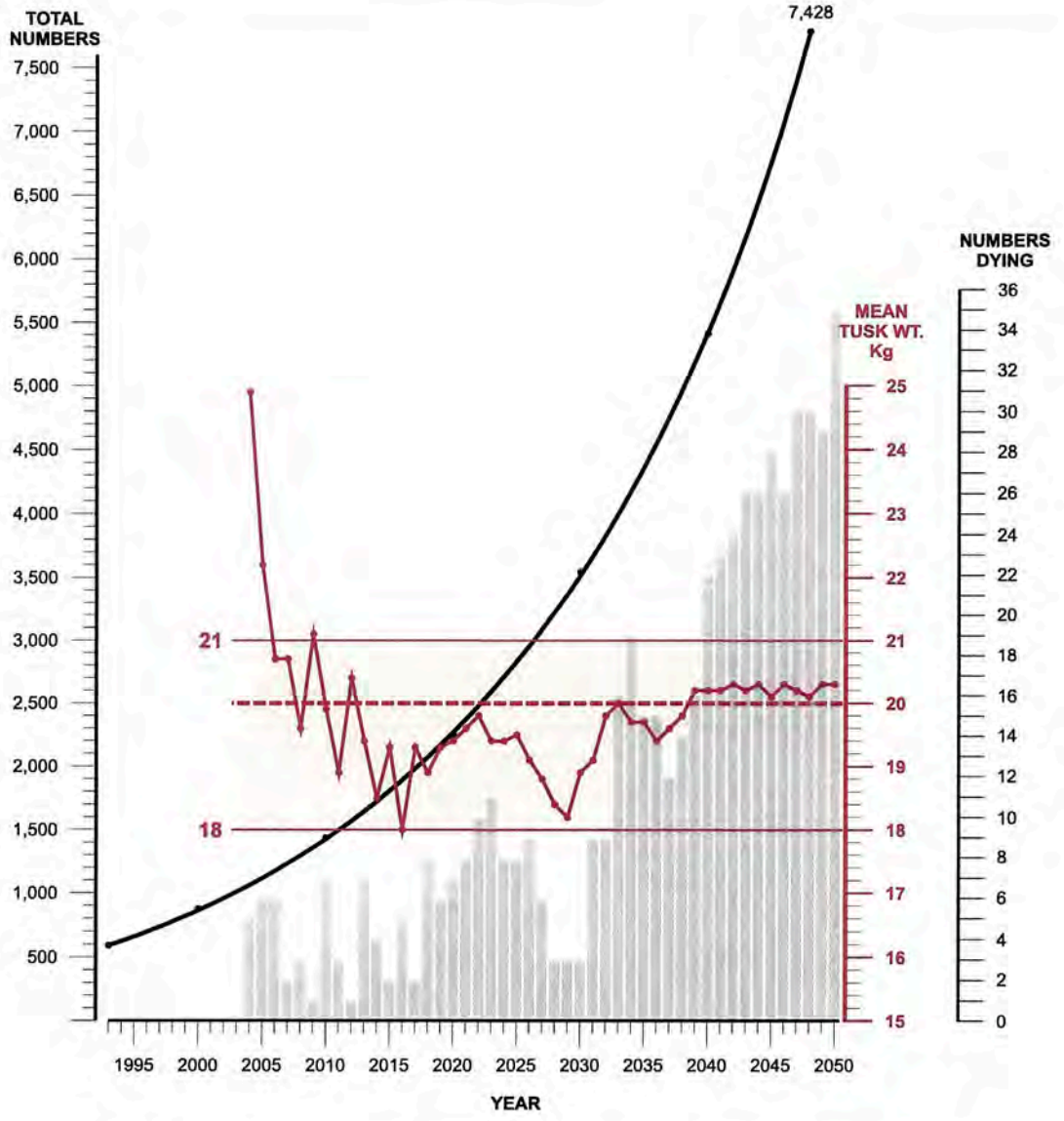

Figure 7: Automatic setting of hunting quotas in an unmanaged population

After the first few years of hunting the automatic quota-setting system maintains the mean tusk weight within about 2kg of the specified level (20kg per tusk) during the difficult period up until 2050 when the age structure of the males is highly irregular. After 2050 the age structure of the population stabilises and the mean trophy weight is maintained within less than 0.25 kg of the desired level. The hunting quota at this stage is 0.45% of the population.

Culling

A large range of options has been tested for possible culling regimes for the Savé Valley elephant population. However, most of these become irrelevant in view of the decision taken in December 2006 that the population should be reduced to below 1,000 animals by an annual offtake of 50-100 animals and should produce a more or less constant harvest thereafter to maintain the population below 1,000 animals.

In a large elephant population (10,000 or more) with a stable age structure, an offtake of about 3.3% of the total population taken from cow herds is sufficient to prevent population increase. Because the Savé Valley population is smaller, has not yet achieved a stable age distribution (and will not do so for another 40 years) and is subjected to losses from illegal hunting and problem animal control, a lower offtake is required. The effects of culling on the present elephant population have been examined for a range of percentage offtakes (**Figure 8** below).

Culling entails the removal of complete breeding herds and affects all females and all males up to the age of 10 years unselectively. The proportion of males older than 10 years included in breeding herds (and being culled) declines with age in the model. In addition to the culling each year, 5 animals are killed illegally, 5 are killed as problem animals and trophy hunting is in place with quotas being set automatically. The population in 2006 is slightly under 1,200 animals and culling begins in 2007.

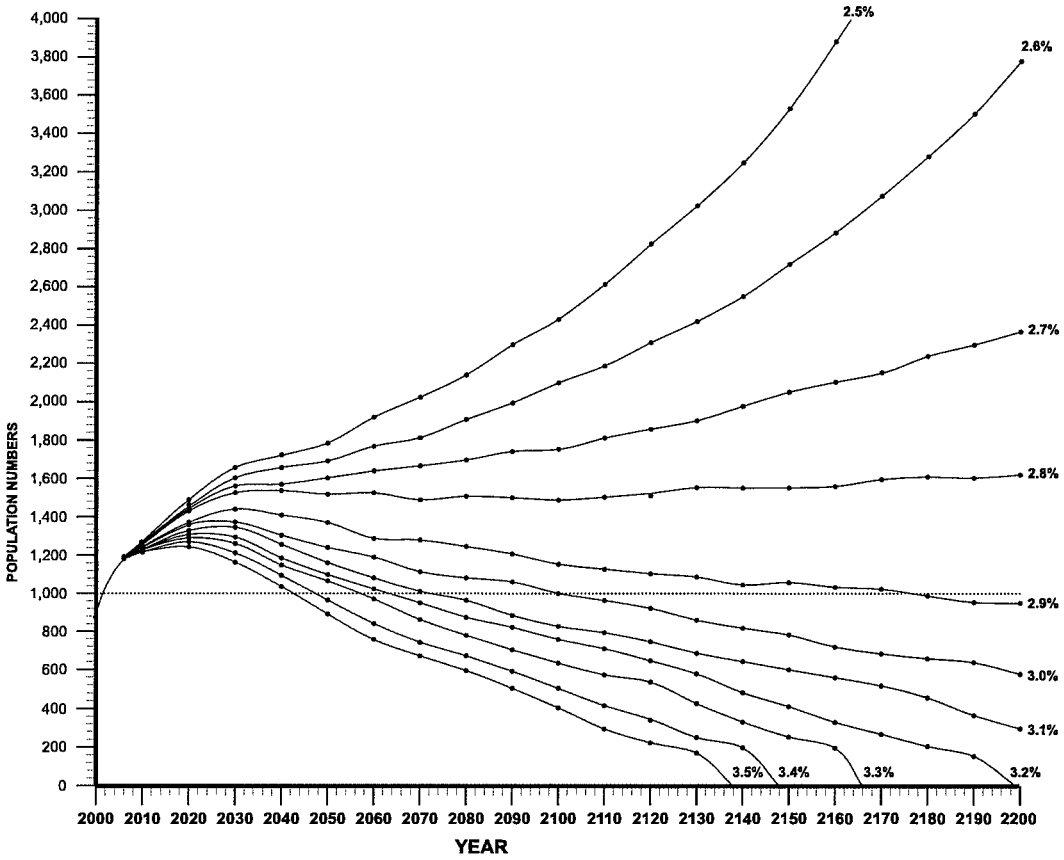

Figure 8: Response of the SVC population to various culling offtakes (%)

A culling offtake of 2.8% applied in 2007 when the population is about 1,200 animals will maintain the population at a more or less constant level. The conditions change slightly for smaller or larger population sizes at the start. If culling is initiated when the population is 1,500 animals it requires an offtake of 2.9% to hold the population constant and, if it is initiated when the population is 750 animals, 2.7% is sufficient. This is partly a 'small population' effect but it is also caused by the fact that the various fixed offtakes (PAC and illegal hunting) amount to a higher percentage of a small population than a large one.

The effects of very small differences in the percentage culling offtake are marked. The curves shown in **Fig.8** assume that present Savé elephant population is about 1,200 animals in 2007 when culling starts. **What if the population is not 1,200 animals ?** Errors of $\pm$ 20% in survey estimates are common. The offtake implied by 2.8% of 1,200 animals is 34 animals at the start. If the true population is 1,500 animals, this offtake is only 2.3% at the start. As the curves of **Fig.8** show, an offtake of 2.3% is not going to cause the population to decrease at all – in fact, it will increase at 2.5% at the inception of culling and, because it is a fixed offtake, the growth rate will increase with time. If the population **is** 1,500 animals, the minimum fixed offtake which will cause it to decline is 55 animals.

There is a second problem with the notion of simply applying a fixed percentage offtake to the population, even assuming that the population estimate of 1,200 animals is correct. The range of percentages which will cause the population to decrease in a gradual manner is between 2.9% and 3.1%. A 2.9% cull will take 170 years to reduce the population below 1,000 animals, a 3.0% cull will take 90 years and 3.1% will take 60 years. Higher offtakes (e.g. 3.5% will achieve the reduction in 40 years) will require to be adjusted to a sustainable offtake immediately after the population has dropped below 1,000 animals. If the objective of reducing the population below 1,000 animals is to be achieved in a reasonable time span, it will require higher offtakes at the start and a reduction in culling pressure once the threshold has been crossed.

This presents a quandary. In order to implement the Conservancy's decision on population reduction we require a method which, firstly, will ensure that the population is reduced below 1,000 animals in a reasonable period (say 15-30 years), secondly, will work whether the true population size is 1,000 animals or 1,500 animals and, thirdly, will satisfy as far as possible the desire for a continuous stream of benefits.

One possible method is to remove a fixed annual offtake from the population until it has dropped below 1,000 animals or decreased by 20%, whichever is the greater, and then to change over to a fixed percentage offtake which will maintain the population at the desired level. This method relies only on being able to detect a change of 20% in the population – which is not an unreasonable demand from air surveys with a reasonable high sampling intensity and prior stratification to reduce the confidence intervals. **The method has one very significant feature** – the time taken for the population to decrease below 1,000 animals (or change by 20%) allows an estimate to be made of what the starting population must have been in 2007 and identifies which of the trajectories shown in **Fig.9** on the next page is most likely to be the correct one.

As stated above, the minimum offtake which will cause a reduction in a population of 1,500 animals is 55 animals per year. If the offtake is set initially at 60 animals per year (which falls within the range agreed at the SVC Quota meeting in December 2006), it ensures that a decrease will happen and allows some striking deductions to be made from the data.

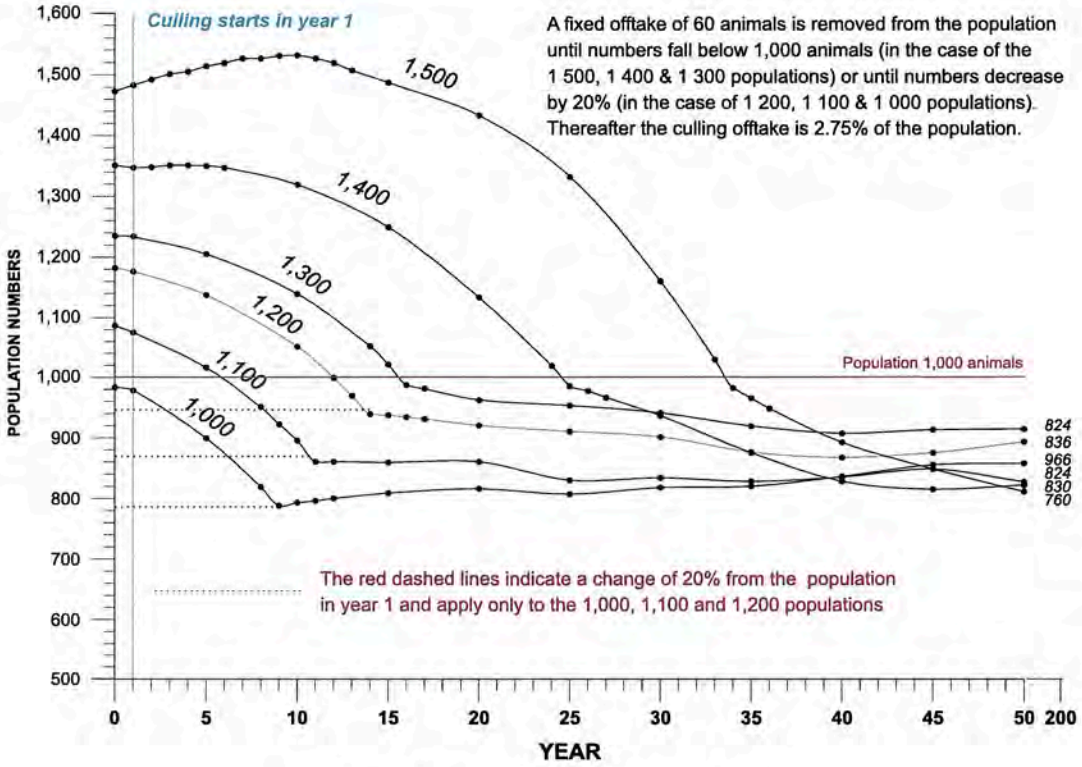

Figure 9: Combined culling regime

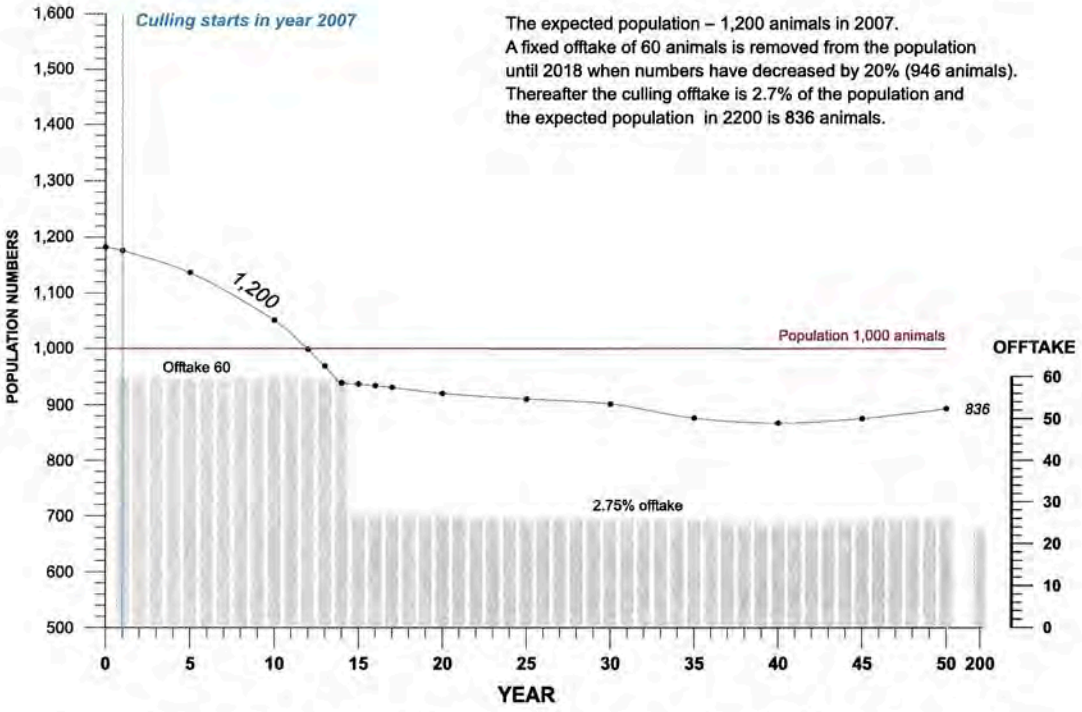

Figure 10: Culling regime applied to a population of 1,200 animals in 2007

If the population in 2007 was 1,500 animals, applying a fixed offtake of 60 animals will result in the population falling below 1,000 animals after 35 years; if the population had been 1,400 animals it would take 25 years; if the population had been 1,300 animals it would take 16 years. A population of 1,200 animals (the expected population – see **Fig.10** on the previous page) would decrease by 20% (946 animals) in 14 years; 1,100 animals would decrease by 20% (869 animals) in 10 years; and, if the initial population had been as low as 1,000 animals, the time taken to fall by 20% (786 animals) would be 9 years. **The time taken for these thresholds to be reached, assuming they can be measured, is a good indicator of the starting population.**

This culling regime is advocated as part of the **Recommended Management Programme** (page 28). However, an important caveat needs to be made: the timings given in the previous paragraph are affected by the extent of illegal hunting and problem animal control. Any reductions in these two forms of exploitation results in the time taken for each of the possible population sizes (1,000-1,500) to be extended before switching over to a percentage cull. Moreover, the culling offtake required to maintain the population below 1,000 animals increases when there is no other exploitation of the population and, in the case when this exploitation is zero, a 3% cull is needed to achieve the objective.

In the questionnaire survey, if elephant numbers were to be reduced most members favoured translocation of live animals where this was feasible but accepted that culling might have to be the fall-back option (Anderson 2005, section 6.3, page 35). From a public relations point of view, it would seem strategically sensible to explore all options for translocation of elephant prior to initiating culling and to use this option wherever possible even if a slight financial loss were incurred. However, elephant are a valuable resource and it does not make sense to forego the potentially high income from elephant products if the members and local communities have to bear substantial costs arising from translocation.

Some Conservancy members have indicated they would like to see fewer tuskless females in the population. An experimental approach could be adopted towards this aim by deliberately selecting cow herds for culling which contain a high proportion of tuskless females. It would be inadvisable, however, to shoot tuskless cows selectively from herds which are not going to be culled in their entirety. This would defeat the objective of maintaining the normal age structure of breeding herds and would be disruptive. Conventional thinking is that the removal of a complete herd minimises trauma and disturbance.

Culling complete breeding herds results in significant changes to the age structure of the population as a whole. The combined effects of culling, illegal hunting and problem animal control are demonstrated in **Appendix 9** (page 64). The effect on trophy hunting quotas is discussed in the next subsection.

Culling and trophy hunting

The effect on the age structure of the population under this type of culling regime is to produce a surplus of males from the age of 15 years old upwards. This allows an increase in the proportion of males which can be hunted as trophy animals. **Even with a fairly high level of problem animal control, sport hunting quotas can be doubled** (see **Appendix 9, Figs.A9.4 & A9.5**). At a level of 0.25 % PAC, quotas of up to 0.8% of the population are sustainable. This result may seem counter-intuitive but it should not puzzle a cattle farmer. The available 'grazing' is being re-allocated to a population which consists of a constant group of breeding females and a group of males which, in the absence of harvesting, would increase to outnumber the females.

The process of adjustment of the upper part of the male age pyramid takes some time and, if hunting offtakes are decided upon in the conventional manner, quotas cannot be increased to the maximum in the year that culling starts – it takes some 30-40 years before the age structure stabilises to the culling regime. However, the automatic quota setting method developed in this study deals with the problem satisfactorily and keeps the quota at all times close to the maximum sustainable level. Under the culling regime specified on page 18, and using the quota setting method described in **Appendix 7** (page 48), the quotas associated with a specified mean tusk weight of 20kg are shown in **Fig.11** below.

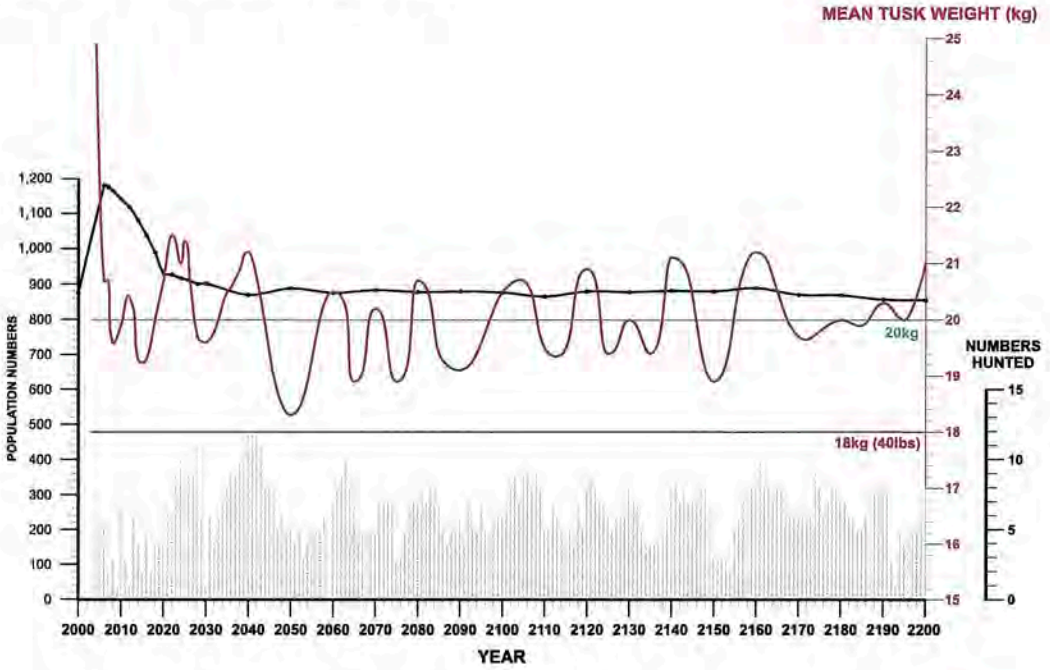

Figure 11: Automatic quota setting for the recommended culling regime

The mean tusk weight remains within ± 1kg of the desired level for most of the 200 year scenario and the method copes well with the two difficult periods near the start (around 2012 and around 2030) when the age structure of the adult males is particularly ragged. Most of the fluctuations in the mean tusk weight are caused by adjustments in the age structure and the effects of problem animal control and illegal hunting.

The facility to set quotas automatically provides a method of examining the required quota levels to achieve specified mean tusk weights. Curves are shown in **Fig.12** below for both the culling and no culling situations. In both cases, the 1993 Savé Valley elephant population has been used as the starting point and there is no other exploitation of the population (no PAC or illegal hunting). In the culling scenario, culling at a level of 3.3% begins in the year 2007 and, in all cases, the population increases for a number of years before beginning to decline. For each data point, once the population falls below 1,000 animals the culling offtake is adjusted to maintain the population between 900-1,000 animals until the year 2200. More than one data point was done for each specified mean tusk weight and the quota was taken as the average quota value over the years 2101-2200 when the age structure was stable.

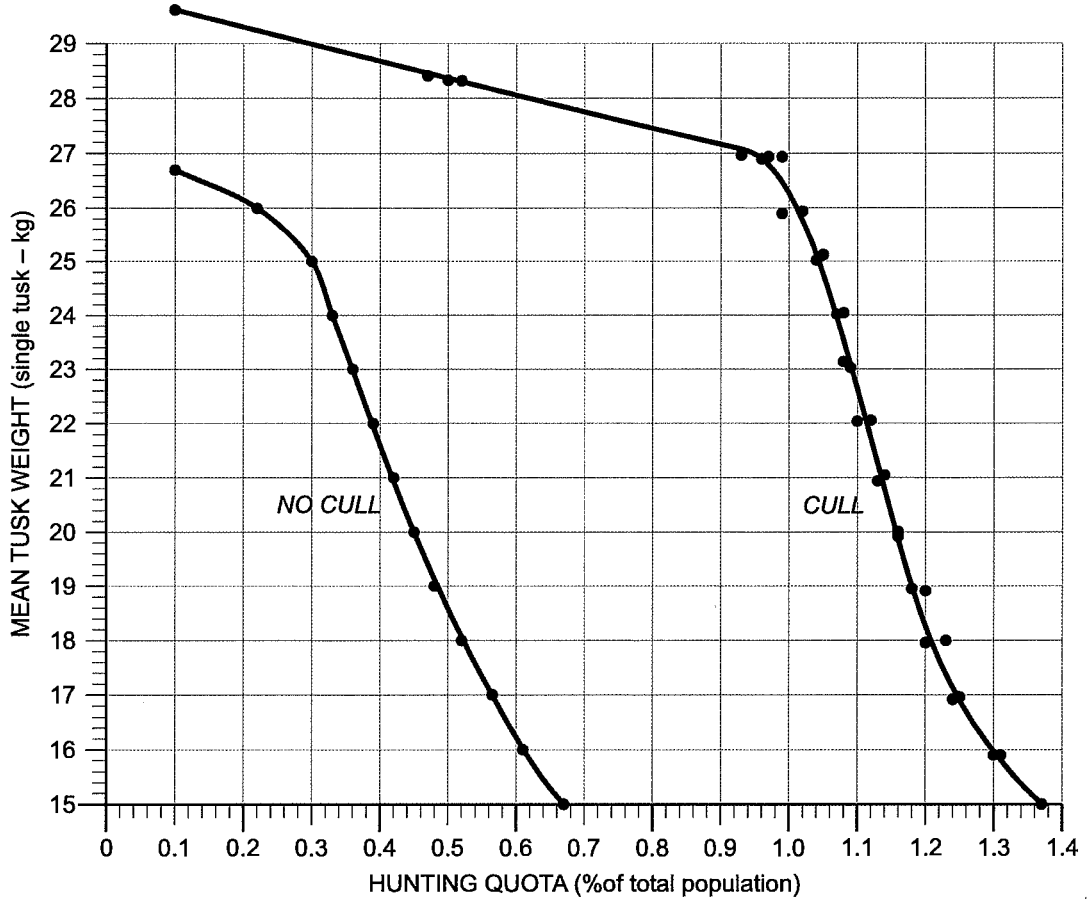

Figure 12: Relationship between mean tusk weights and hunting quotas

The results are fairly striking. Under the culling scenario, mean tusk weights greater than 25kg are possible with quotas greater than 1% of the total population. In the absence of culling, to achieve the same mean tusk weight requires the quota to be no more than 0.3%. A mean tusk weight of 20kg – a value which would satisfy most Conservancy members – is obtainable under the culling scenario with a quota of 1.16%: with no culling the corresponding quota is 0.45%.

Management of the Elephant Population

Goal and objectives

The following are suggested –

GOAL

The Conservancy wishes to carry an elephant population which earns a significant income for its members at the same time as sustaining biological diversity

ECONOMIC OBJECTIVE

To realise the full economic potential of elephants

ECOLOGICAL OBJECTIVE

To limit habitat damage and interspecific competition with other valuable wildlife species

SOCIAL OBJECTIVE

To reduce conflict between elephants and neighbouring people and to generate benefits from the elephant population

Management options

In view of the decision taken by the members' at the Quota Meeting in December 2006 to reduce the population gradually to less than 1,000 elephants, the need to review a range of options falls away. Only a few brief comments will be made here –

No intervention: This was never a serious option. In Anderson's 2005 survey (Section 6.3, p35) all respondents accepted that ultimately there would be a need to control elephant population numbers. Numerous advisors to the Conservancy have recommended that the population should be limited sooner rather than later (e.g. Martin 2005c).

Contraception: A plethora of arguments can be given against considering this as a method to limit the population but perhaps only two are necessary.

The Savé Valley Conservancy is not in the business of conservation for conservation's sake. It is a wildlife producer for the long term benefit of its members (including neighbouring local communities) and for the economy of the nation at large. Having successfully established a productive elephant population there is no logic whatsoever in stopping that production. It should be used to benefit the Conservancy and its neighbours.

The long term effects of applying a biological selection pressure on a large wild mammal species are unpredictable and very likely undesirable. The Conservancy has opted to use wild animals as a form of land use because domesticated species such as cattle have proved unsuccessful – the genetic modifications made to cattle over the years have rendered them unable to adapt well to the conditions of the south-east lowveld. It would be a pity to change the characteristics of elephants in the same way.

The fact that contraception is even considered in some situations as a potential solution to to overpopulation is a tacit **acknowledgement that elephants do become overabundant**. Often the same groups that advocate contraception are reluctant to concede that elephants cause a reduction in biological diversity and modify landscapes in an unacceptable manner.

Capture and translocation of complete elephant herds: Many conservationists see the translocation of elephants as the antidote to culling. Where numbers are considered overabundant in one locality, elephants can be moved to start new populations or re-establish populations which have been wiped out in other areas. This is unlikely to solve overabundance in Savé Conservancy in the long term – it may gain a little breathing space for a short period. Ultimately, elephants will double in numbers within 15-25 years and quickly reach densities where they become a problem again.

Translocation of elephants is expensive and the costs are only likely to be met through donor funding. However, the Conservancy would be well advised to consider this option first and use it when funds are available. The 'green' lobby is unlikely to be sympathetic if the SVC embarks on culling without exploring all alternative options to killing surplus elephants.

One important point needs to be made here: the proposed management programme treats elephants as valuable assets belonging to the SVC stakeholders. Culling should generate about US$100,000 annually which can be re-invested to enhance the wildlife status of the Conservancy. **In weighing up whether to co-operate on a translocation exercise which achieves the same as culling, the Conservancy should seek not only that all costs are met by outside agencies but also that their financial return is no less than they would have achieved through the culling option.**

Scenario modelling

A range of financial scenarios have been explored which were presented to the SVC members on 5th December 2006. These scenarios examined the expected financial returns from managing the Savé Valley elephants for population sizes ranging from 750-2,500 animals and included all income from hunting, culling and natural mortality. In view of the decision taken at the meeting, these analyses become less important but it is worth reiterating the conclusions drawn from them.

(a) There is remarkably little difference in the accumulated net income achieved from population sizes of 750–2,500 animals. With smaller populations (less than 1,250 animals) income accrues early from culling operations and earns interest: with larger populations (1,500 animals or more) little income is earned at the start but ultimately there is a slightly higher income from trophy hunting. However, the accumulated income up to the year 2050 from every scenario is between US$40-$50 million.

(b) Although ultimately a large population will earn slightly more income (disregarding the economic loss of habitat degradation), the return per live elephant in the population decreases progressively with population size (**Fig.13** below).

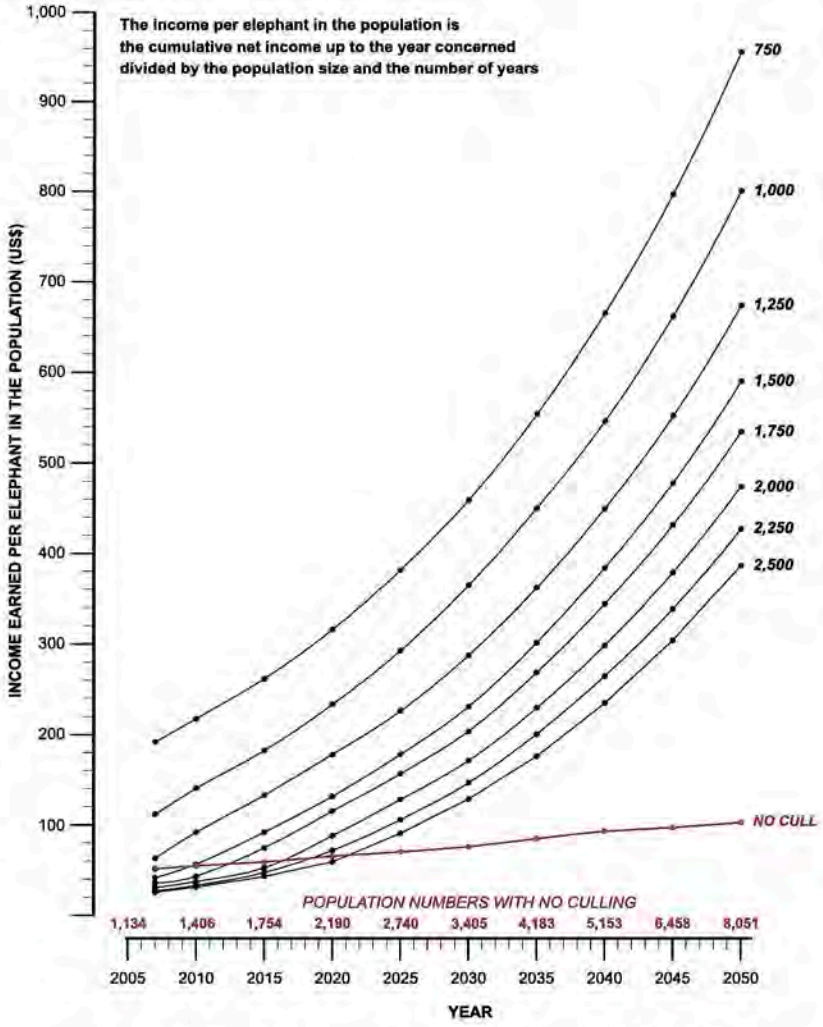

Figure 13: Financial return per elephant in the population

The single scenario arising from the decision to limit the population to less than 1,000 animals is now examined. The assumptions which underlie this analysis are listed below.

BIOLOGICAL ASSUMPTIONS

Longevity: **50** years

Age at first parturition: **12** years

Fecundity: **0.25** calves/year

Central mortality: **0.5** % (see page 41)

Population age structure in 1993 as shown in **Fig.2a** (page 8)

MANAGEMENT ASSUMPTIONS

Illegal hunting: **5** animals per year from 2004

Problem animal control: **5** animals per year from 2003

Hunting quotas set automatically and maintain mean tusk weight at **20kg**

Culling is according to the management recommendation given on page **18**

FINANCIAL ASSUMPTIONS

Interest of **5%** accumulates on all income annually from 2007

Safari Hunting

Elephant bull trophy fee: **US$10,000**

Daily rate: **US$1,000**

Minimum length of hunt: **20** days

Operating costs: **US$500** per day

Culling

Price of live calves 3-10 years old: **US$8,000** (see discussion on the next page)

Price of wet meat: **US$1** per kg

Dressing out proportion: **33** %

Price of dry salted skin: **US$5** per kg

Ivory prices: as shown in **Fig.14** on the next page

Natural mortality

All tusks from animals dying naturally within the Conservancy will be recovered

Sale of live calves

It was a standard practice in culling operations carried out by National Parks during the 1970s and 1980s to capture as many calves as possible between the ages of 3-6 years old for sale as live animals to any interested buyers. In all cases the income from such sales exceeded the commodity value of their meat and skin. The advent of the market for domesticated elephants has significantly 'altered the equation'. Martin & Jones (2000) estimated that the highest land use value possible for wildlife lay in the returns from using domesticated elephant in the tourism industry.

In December 2006 a large tourism operator in Zimbabwe was asked about the demand and prices which a supply of young elephants to be used for domestication could command. The advice was that the demand was high (notwithstanding the slump in the tourist industry) but that the maximum number of elephants the market would stand was about 5 animals per year. However, if such a supply were possible, the elephants would fetch prices around US$8,000 each indefinitely – a larger supply would reduce the price. Suitable elephants would be males or females between the ages of 3-10 years. Given the current controversy about capturing young elephants from the wild for domestication,[5] the SVC may be ideally placed to satisfy this market.

Ivory values

Because the African elephant is listed on Appendix I of CITES, ivory from Zimbabwe cannot be traded legally at present (see discussion on page 3). The Conservancy should store all ivory *in situ* pending the re-opening of legal markets or, alternatively, until mechanisms are established to sell the ivory at its real value.

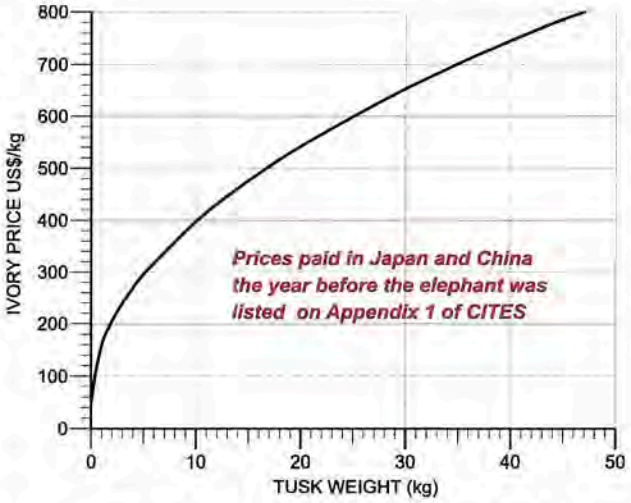

Figure 14: Ivory price versus tusk weight

The Conservancy could request Government to submit a proposal to CITES which would enable the SVC to sell ivory despite the general ban. Given the fact that the Savé Valley elephant population was established through the efforts of its members with the full support of Government and that any returns from ivory would benefit the stakeholders (including local communities), such a proposal would challenge the global politics of conservation.

In the analysis which follows, all income which should accrue from ivory is separated from other income in order not to give the impression of a higher potential return from elephant than will actually be the case in the immediate future.

5. Shearwater (Pvt) Ltd captured young elephants in October 2006 from elephant herds in Hwange National Park with Parks' permission but have found themselves the target of law suits from the NSPCA and court orders to release the elephants back into wild. One argument that has been used against them is that such elephants should only be acquired through legitimate culling operations (Martin 1999a). The SVC would be able to satisfy this requirement.

The expected income from an elephant population managed between 750-1,000 animals under the culling scenario outlined on page 18 is shown in **Table 2** below. The figures given are the average values over the period 2007-2057 rounded to the nearest US$1,000. There is a marked drop in the culling income in the year 2020 when the transition takes place from a fixed cull of 60 animals per year to an annual offtake of 2.75% of the population. However, this is compensated for by the improvement in trophy hunting quotas as the age structure stabilises after 2020.

Table 2: Annual income under assumed conditions

	GROSS	COSTS	NET	LAND USE
TROPHY HUNTING				US$/hectare
Safaris	187,000			
Meat	10,000			
Skin	3,000			
Subtotal	200,000	62,000	138,000	0.41
CULLING				
Calves	40,000			
Meat	14,000			
Skin	7,000			
Ivory	40,000			
Subtotal	101,000	11,000	90,000	0.26
FOUND IVORY	37,000	—	37,000	0.11
TOTALS	**338,000**	**73,000**	**265,000**	**0.78**

The net income attributable to ivory in **Table 2** is **US$77,000** per annum (about 29%). Without this amount, the realisable annual income for the Conservancy decreases to US$188,000 and the land use value from elephant management drops to US$0.55/ha. This is a substantial 'tax' on wildlife management.

The scenario shown in **Table 2** has been remodelled assuming that there is no illegal hunting and no animals are lost to problem animal control (**Table 3** below).

Table 3: Annual income with no illegal hunting or problem animal control

	GROSS	COSTS	NET	LAND USE
TROPHY HUNTING				US$/hectare
Safaris	318,000			
Meat	17,000			
Skin	5,000			
Subtotal	340,000	106,000	234,000	0.69
CULLING				
Calves	40,000			
Meat	18,000			
Skin	8,000			
Ivory	50,000			
Subtotal	116,000	11,000	105,000	0.31
FOUND IVORY	32,000	—	32,000	0.09
TOTALS	**488,000**	**117,000**	**371,000**	**1.09**

Problem animal control and illegal hunting are a staggering loss in net income to Savé Conservancy – well in excess of US$100,000 per annum. A fixed offtake of 5 problem animals per year results in the average potential hunting quota[6] having to be dropped from 1.12% of the population to 0.67% – a net financial loss of US$97,000 per year. With no illegal hunting, the initial culling offtake of 60 animals persists up until the year 2028 (under the assumed scenario it is 2020) and, when the transition is made to a fixed percentage of the population, it requires a 3% offtake from the population to maintain it below 1,000 animals. This increases the net income from culling by US$13,000 per year. The income from found ivory decreases slightly when there is no illegal hunting or PAC (US$32,000 versus US$37,000) – this would appear to be because the increased hunting quotas and culling offtakes leave fewer animals to die of old age.

The issues raised by Peter Lindsey in **Appendix 3** (page 37) regarding the relationship between neighbouring peoples and illegal hunting assume a very real urgency under this finding.

The cumulative income earned from elephant management over the period 2007-2050 (which includes 5% annual interest) is shown in **Fig.15** below., By the year 2050 the Conservancy should have accumulated earnings of **US$40 million** from its elephant management. Of this amount, US$9 million is made up of potential ivory income so that the realisable income is reduced to about US$31 million. Sport hunting contributes 77% and culling 23% of the realisable income.

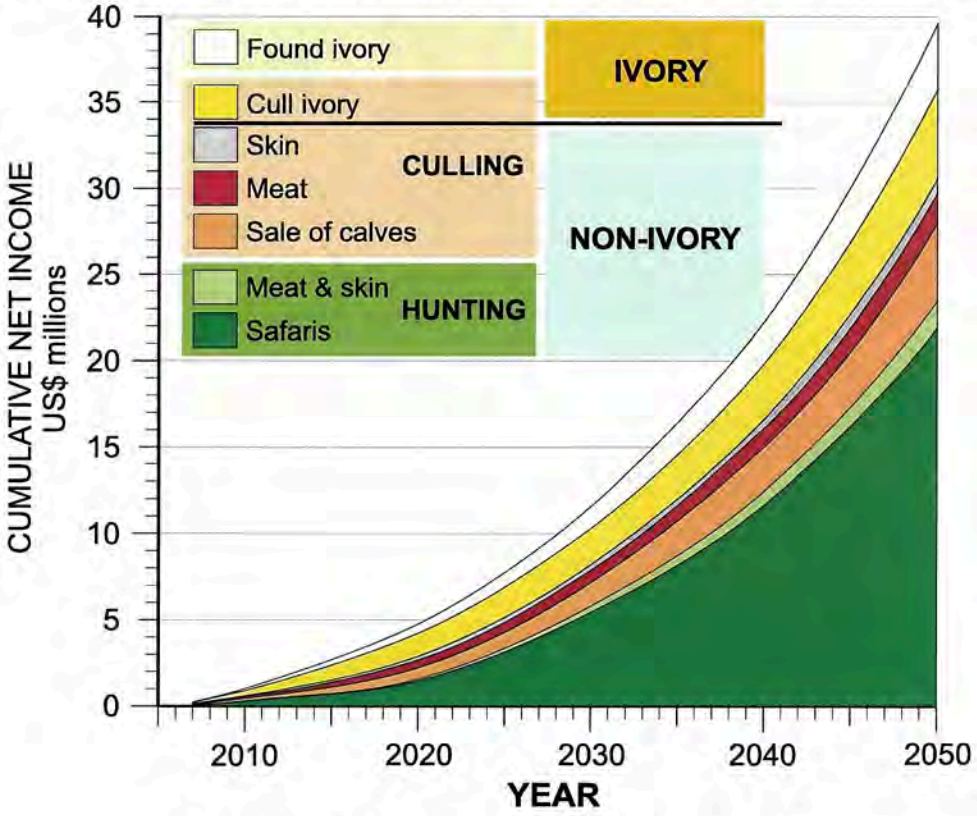

Figure 15: Cumulative income from management

6. When there is no PAC or illegal hunting, the automatic quota setting performance is improved if the constant governing the integral component in the formula given in **Appendix 8** (page 63) is changed from C = 0.03 to C = 0.005.

Recommended Management Programme

Given that –

- At present the Savé Valley elephant population is contributing far less than its available potential to the development of the Conservancy and its neighbouring peoples;
- Conflict with elephants is escalating in the communal lands surrounding the Conservancy resulting in a high level of problem animal control which, in turn, is reducing the income-earning potential of the population;
- Poverty is general in the areas adjacent to the Conservancy and this is giving rise to illegal hunting of elephants in the Conservancy for meat, further reducing the higher-valued management options;
- Over the next 50 years there is little difference between the maximum earnings possible from the elephant population in the Conservancy whether it is managed at a level as low as 750 animals or as high as 2,500 animals: however, the earnings per individual elephant in the population become progressively less the larger the population;
- Extensive modification of habitats takes place at elephant densities greater than 0.3/km^2 – and this level has already been exceeded in the Savé Valley Conservancy;
- Direct and indirect competition with other ungulate species is likely when the metabolic biomass of elephants is more than 25% of the available carrying capacity – and the population is at this level;

The Savé Valley elephant population should be maintained below 1,000 animals and managed for the maximum sustainable returns for the stakeholders, including neighbouring communities

In recommending how to achieve this, every effort has been made to use techniques which do not rely on accurate annual estimates of population numbers.

1. **Culling**: Beginning this year, complete cow herds totalling about 60 animals should be removed annually until the population falls below 1,000 animals or, if the current estimate indicates the population is close to1,000 animals, until there is a decrease of 20% in the number. Thereafter, an annual cull of 2.7% of the population estimate should maintain the population between 750 and 1,000 animals.

   The overall returns from culling will be increased if a limited number of live elephants are captured from the herds being culled for sale to the domesticated elephant market (page 25).

   Noting that some Conservancy members want more elephants on their properties and others want fewer, **population reductions should take place only those properties where the owners and managers want fewer elephants**. Management should be done at the scale of the entire conservancy but the actual sites where elephant will be removed should be by agreement amongst the members. This falls into the category of 'source-sink' population reduction. It should have the desirable effect of discouraging elephants from going onto properties or into vegetation types which managers want protected.

2. **Hunting**: The method of setting hunting quotas for trophy elephant developed in this study (page 13) should be applied to the population since it maximises quotas, maintains a given average trophy size, copes well with irregular age structures and automatically takes into account external factors such as PAC. It does require a complete and accurate record of tusk weights in each hunting season.

3. **Problem Animal Control**: Close liaison is needed with National Parks staff and neighbouring communities on this matter since the financial losses to the Conservancy from PAC are extremely high (page 26). Every effort should be made to reduce the numbers of animals killed on PAC including experimenting with non-lethal deterrents.

4. **Illegal hunting**: Illegal hunting for meat is achieving the lowest-valued use of a potentially valuable resource. Since neighbouring communities are stakeholders in the Conservancy, this is a self-defeating practice. It is possible that a regular and substantial supply of meat from culling operations and a raising of awareness about the financial implications will reduce the incentive for illegal hunting.

This management programme has not addressed the resilience question raised under **Complex Systems** (page 4) in the **Issues** section at the beginning of the report. In attempting to impose too inflexible a management programme on the elephants, there is a risk that other components of the ecosystem may lose resilience. This issue is raised again in the next and final section – **Research and Monitoring**. Perhaps, it is legitimate to use the ultimate cop-out at this stage: no elephant management programme that has been undertaken in Zimbabwe has ever persisted for very long or gone according to long term plans. The greatest threat may not lie in a loss of resilience caused by rigid management – rather it may lie in an ability to do any effective management as a result of rapidly changing externalities.

It was mentioned at the end of the section on **Complex Systems** (page 5) that the present system of seeking National Parks approval in advance to undertake management activities is not conducive to the adaptive and flexible management needed in the environment of the south-east Lowveld (Cumming 2005). The SVC should seek to change this *status quo* by negotiation with the government agency. **Far more emphasis should be placed on reporting at the end of a management year rather than on 'approval' at the start of the year.**

Research and Monitoring

Martin (2005c) reviewed the Savé Valley elephant research programme and was critical of a number of the projects. The schedule of research projects reads as a long list of 'essential' information needed prior to the taking of any management decisions.

There is no continuum between having a large amount of technical ecological data and taking management decisions (Bell 1983). The elephants, habitats, people, politics, management and economics in Savé Valley Conservancy constitute a complex system in which the outcomes of various management options will not easily be predicted by reductionist science. Ultimately, decision-taking may be based on aesthetic preferences as to the appearance of landscapes or the economic factors affecting commercial operations. Indeed, the aspirations of the SVC members may provide a higher-order basis for decision-taking.

There should, however, be concerns about the perceptions of research and monitoring which appear in the report on the SVC members' aspirations for the elephant population (Anderson 2005). It is clear not only from the members' opinions but also from the manner in which the questionnaire is structured that many see a distinct separation between research and monitoring. Research is seen as the carrying out of discrete one-off studies which (hopefully) answer a question after which 'the file can be closed'. One respondent to the questionnaire (Anderson 2005, section 8, page 31) questioned this approach, expressing a view that the greater need was for monitoring. If more than lip-service is to be paid to the concept of adaptive management then **there should be no conceptual difference between research and monitoring.**

In a situation such as that affecting the Savé Valley elephants, **adaptive management is the research vehicle.** The research process consists of making hypotheses, carrying out management actions, monitoring the outcome of those actions and modifying either the management actions, hypotheses or objectives as a result of the findings. Few studies have a valid life outside of this process. Hilborn and Ludwig (1993) state that "in many cases the only way to learn about sustainability is to exploit the resource". This is the basis of adaptive management.

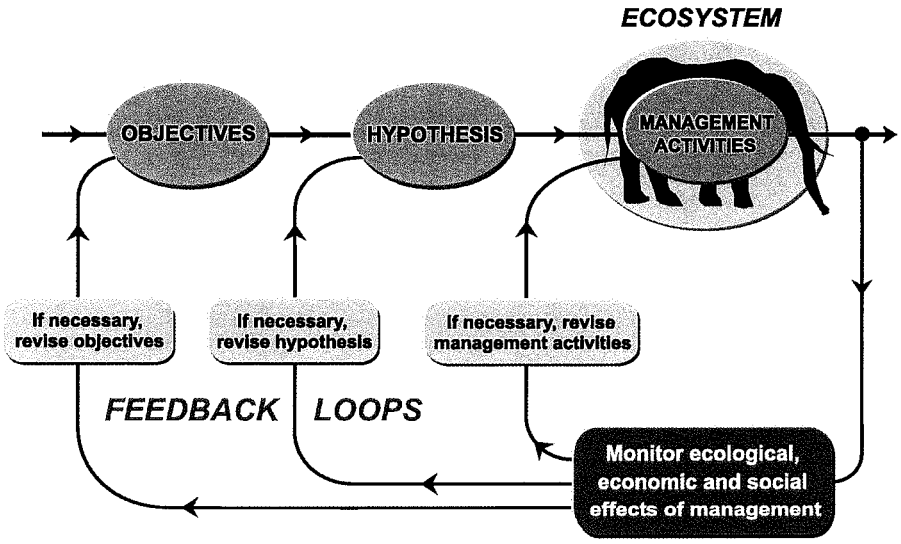

Figure 16: Adaptive Management

An elegant description of adaptive management is given by Bell (1986) –

> ***"The concept of Adaptive Management is simple and might equally be well be described as common sense. In this concept, conservation and wildlife management are seen as being based on a set of disciplines, ecology, sociology, and economics, which are exceedingly complex and poorly understood. Therefore, conservationists and wildlife managers characteristically operate in situations where the outcome of their actions is uncertain. Whenever we do something in these areas, we are never certain that the results will be as we expect, and we can be confident that there will be at least some unexpected side effects.***
>
> ***We argue, therefore, that the profession of wildlife management as a whole must be consciously structured to cater for these uncertainties, as well as for changes in value systems, policy and technical capabilities. This means that the profession as a whole must be organized as a self-testing and self-evaluating system operating by feedback in relation to clearly defined objectives. In particular, each act of management or management procedure must designed to serve as a test of the theory on which it is based. It must have a clearly designed objective, a defined procedure, preferably including controls, a means of recording and reporting progress in relation to the objective, and a means of evaluating the procedure on the basis of which to decide whether to continue, improve or discontinue it as appropriate."***

All research and monitoring needs to be seen as a potential overhead cost for the conservancy. Although donors may fund particular studies, any project which has to be continued after donor funding ends requires to be scrutinised critically because of its implications for the conservancy overhead management costs. Reflecting on the definition of adaptive management given above, Bell (pers.com.1998) observed that it "*was written in the days when we felt we should be doing more research to reduce uncertainties. These days it should be stated as part of the definition of adaptive management that intensive levels of research which will result in a system being too expensive, and hence unsustainable, cannot and should not be attempted.*"

From the intensive population modelling work done in this study and from the discussions held at the Quota Setting Meeting in the Conservancy in December 2006, my perceptions of research priorities have shifted slightly since the review done on the Savé Valley elephant research programme in 2005. At that time I advocated a major research thrust into obtaining a better understanding of the age structure of mature adult males in the population since it seemed critical to the management of trophy hunting. I no longer regard that as a priority since the method of automatic quota setting developed in this study is based solely on the mean tusk weight from hunting and requires no knowledge of the numbers or ages of the adult males.

At that time I also was concerned that whilst the skewing of the age pyramid caused by culling might produce more trophy males it might also cause an increase in male biomass which would defeat one of the main objectives of the culling – that of reducing the impact on habitats. I have since tested that scenario and found it to be far less significant than I feared.

Record-keeping

The highest priority for the Conservancy is to keep accurate records of the results of its management activities. *Inter alia* this must include a complete record of all elephant mortality from culling, hunting, problem animal control and illegal hunting; trophy records;[7] meat, hide and ivory production from elephants; financial records of all earnings due to elephant (at the corporate level); and quantitative and qualitative socio-economic information relating to elephants and neighbouring communities.

The Conservancy is engaged in a real-life adaptive management experiment and this monitoring is vital not only for its own survival but also for the broader knowledge of wildlife management as a land use. The outcomes of the all the population modelling scenarios in this study are no more than hypotheses to be tested under adaptive management. These hypotheses include assumptions about the fundamental population dynamics of elephant, their response to various management treatments and the potential earnings from elephants in the market place. The validity of the model needs to be tested and the model needs to be updated and improved using the real data from field results.

Population numbers

In testing various culling scenarios in this study, it is apparent that all of them could be a long way off target if the estimates of elephant population numbers are grossly inaccurate. The culling regime advocated is robust and does not require annual elephant surveys: however, it does require periodic surveys (e.g. every five years) which have a high degree of accuracy and precision. For standard strip count air surveys this implies prior stratification of the conservancy based on previously observed elephant densities and a relatively high sampling intensity. Any 'total count' survey method should be modified into a 'block count' format so that standard errors and confidence intervals can be calculated.

In the review done in 2005, I felt that the absolute number of elephants was not the key issue for decision-taking and that adaptive management based simply on the trends in vegetation change could provide the basis for deciding annual culling offtakes. A new factor has entered into the equation which alters this perception. The desire of the members to avoid any large initial culls and to derive a steady stream of benefits from elephant harvesting does require a better knowledge of elephant numbers – particularly because the response of the elephant population to any given culling offtake contains unexpected delays.[8]

Since survey costs will ultimately be borne by the Conservancy, the emphasis should be less on frequent surveys and more on precise and accurate surveys at longer time intervals.

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7. It was apparent at the quota setting meeting in the Conservancy in December that the record of hunting trophies was severely deficient.

8. For example, an annual cull of 60 animals from a population of 1,500 animals will allow the population to increase for 8 years before it begins to decline. It takes another 25 years for the population size to fall below 1,000 animals but it takes only another 15 years for it to go extinct.

Vegetation monitoring

Although there is a need for an unbiased system to assess the overall status of habitats, the impact of elephants on vegetation is not uniform and **a general system may not capture sites of specific concern.** There is a strong case for identifying the areas where elephants are having a noticeable impact at the moment and areas where they might have an unwanted impact. Simple monitoring systems which are easy to maintain – such as photopanoramas – should be established in the selected sites and plans made to monitor them annually (Dunham & Robertson 2002).

Resilience

The question of possible negative impacts of constant harvesting on the resilience of both the ecosystem and the elephant population remains unanswered. Before any simplistic research project is framed to answer it, there is merit in calling a round-table discussion of relevant persons to tease out the questions which need to be asked and the indicators which might provide some measure of larger scale ecosystem changes resulting from the culling. In a discussion at the start of this study, Graeme Cumming (pers.comm. December 2006) asked the question "Resilience of what to what ?" and it seems to me that without some clarity of the ecosystem components which one might expect to be adversely affected by culling, the forebodings will remain vague. It may well be that the first indicators of unwanted change will be detected by the Conservancy members themselves and this will provide the basis for the next steps in investigation.

Other studies

Despite having spent weeks modelling different population scenarios for the Savé Valley elephants, I feel there are many more aspects to be explored. It was only at a fairly late stage in this study that I discovered the full impact of problem animal control and illegal hunting on the production from the population. Two avenues of further exploration suggest themselves.

The automatic quota setting method for trophy hunting can be used as a 'reverse tool' to give information about the extent of processes for which there are no data (e.g. at present the Conservancy does not know how many problem animals are killed outside their boundaries because National Parks does not provide them with this information). In a population where there is culling but no problem animal control, the expected quota for trophy males which are being managed to produced a mean tusk weight of 20kg should be around 1.15% of the population. If the actual quota to produce this tusk weight is as low as 0.5% of the population, it is a clear indicator that problem animal control must be accounting for a large number of potential trophy males. Some population modelling would enable the relationship to be calibrated.

In a population where there is culling but no illegal hunting, it requires at least a 3% offtake from the population to prevent it increasing. If it turns out in practice that an offtake of 2.7% is sufficient to limit the population, then this is an indication that somebody else is using 0.3% of the production !

Appendix 1

Management Recommendations made in November 2005

These recommendations were made by the consultant last year as part of a review of the elephant research programme in the Savé Valley Conservancy (Martin 2005c).

We are ready to examine a provisional management programme which, firstly, goes some way towards satisfying the desires expressed by members in Anderson (2005) and, secondly, leads logically to an associated research programme.

1. It has been argued that the safest option is to **act immediately in limiting the population**. Costs are lower, damage is pre-empted, and the impact of small culling operations is low.

   I do not believe that population reduction should wait until some quantitative 'thresholds of potential concern' have been crossed (such as South African National Parks seem intent upon employing). Such indicators are unlikely ever to supercede the ability of perceptive managers to detect situations which are not to their liking.

2. Taking note of the potentially conflicting situation where some members want more elephants and others want fewer, it is suggested that **population reductions take place only those properties where the owners and managers want fewer elephants**. Management should be done at the scale of the entire conservancy but the actual sites where elephant will be removed should be by agreement amongst the members.

   This would fall into the category of 'source-sink' population reduction. It has the desirable effect of discouraging elephants from going onto properties or into vegetation types which managers want protected.

3. **Management should be aimed at limiting elephant damage to key habitats.** This implies that vegetation monitoring sites need to be established in these key habitats. The number and location of these sites is a subject for a separate study. The work already done by Baker (1994), Du Toit & Du Toit (1994) and recommendations from Roberston & Dunham (2002), and Dunham & Roberston (2002) provide an adequate basis for deciding on these sites. The vegetation mapping currently being done by Robertson (2005) may provide additional insights into the monitoring requirements. Two important points need to be made with regard to this monitoring –

   If the aim is to reduce damage to key habitats, then **the ongoing numbers of elephant to be removed from the population must be decided from the results of this monitoring and not from percentage offtakes applied to aerial survey estimates.**

   Because of the lag effects in vegetation recovery following elephant population reduction, **counts of numbers of canopy trees may not be the appropriate indicators for decision-taking**. Once a woodland has been destroyed, many years may have to pass before it will be restored. An index of its recovery may lie in the recruitment of woody plants of the dominant tree species into younger and smaller age classes. Ultimately, decisions to remove animals may have to fall back on the aesthetic perceptions of the conservancy owners and managers – and these decisions may be entirely qualitative.

4. Some conservancy members would like **larger numbers of elephant in order to increase trophy hunting quotas**. It has been pointed out that, in the absence of any other management, the numbers of elephant which can be hunted sustainably is linearly proportional to the size of the population. To make any significant difference to present trophy hunting quotas requires substantial population increases (200 additional animals for every bull which can be placed on quota).

   One way to increase trophy hunting quotas is to carry out conventional culling (or translocation of complete herds). It may seem counter-intuitive but it is a process of re-shaping the population age pyramid to produce a surplus of adult males for the same numbers of animals on the land. However, the process requires detailed monitoring because the net biomass on the land may increase – even if numbers are less. Also, since the major damage to vegetation is done by adult males, population reductions may not be as effective as hoped for in conserving vegetation. These issues point the way to a major research focus.

Appendix 2: Modelled Growth of the Savé Valley Elephant Population

Running the model with the initial cohort shown in **Fig.2a** (page 8) results in population of about 1,254 animals in the year 2007. The initial growth rate of population is about 5% in 1994 rising to a peak of about 6% in 2003 when the large group of subadult females under the age of 10 years reaches maturity and stabilising at 4.7% when the population reaches a stable age structure after about 50 years. Population growth remains above 5% until the year 2015.

It takes 50 years to get rid of the various 'bulges' in the age pyramid and the population in the year 2050 would be about 8,000 animals – which is somewhat academic since management interventions will have been made well before this time.

The age structure of the starting cohort can be varied considerably from the values used here without significantly affecting the results of the modelling. The 'normal' rate of growth of an elephant population which has achieved a stable age structure is between 4.5 and 5% per annum. Observed growth rates which exceed this are seldom the result of any increased breeding performance but are rather an artefact caused by the population having not achieved a stable age structure.

Mockrin (2000) quotes Calef (1988)'s figure of a growth rate of 7% for an elephant population. With a stable age structure such growth rates are almost impossible to achieve – even by setting mortalities equal to zero and fecundities at one calf every three years.

This calls into question the value of any study attempting to establish the age and sex structure for the population –

(1) The results of the study will be true for a moment in time only – it will take 50 years before the age structure stabilises;

(2) The apparent growth rate derived by comparing the young of year with the total population is a meaningless statistic – until the stable age structure is achieved;

(3) Once management interventions are made the age and sex structure will alter anyway;

(4) Given the possible synchronising of births caused by seasonal effects in an area such as Savé Valley, the measurements would have to be continued over a minimum of four years to overcome these cyclical effects;

(5) Finally, it is difficult to see what the data would be used for. They are not needed for management decisions.

#	Year	Pop	No/km²	Rg %
0	1993	592	0.17	–
1	1994	622	0.18	5.07
2	1995	656	0.19	5.47
3	1996	693	0.20	5.64
4	1997	733	0.22	5.77
5	1998	777	0.23	6.00
6	1999	824	0.24	6.05
7	2000	874	0.26	6.07
8	2001	927	0.27	6.06
9	2002	983	0.29	6.04
10	2003	1,038	0.31	5.60
11	2004	1,090	0.32	5.01
12	2005	1,143	0.34	4.86
13	2006	1,198	0.35	4.81
14	2007	1,254	0.37	4.67
15	2008	1,311	0.39	4.55
16	2009	1,372	0.40	4.65
17	2010	1,435	0.42	4.59
18	2011	1,500	0.44	4.53
19	2012	1,567	0.46	4.47
20	2013	1,638	0.48	4.53
21	2014	1,713	0.50	4.58
22	2015	1,793	0.53	4.67
23	2016	1,875	0.55	4.57
24	2017	1,959	0.58	4.48
25	2018	2,048	0.60	4.54
26	2019	2,141	0.63	4.54
27	2020	2,240	0.66	4.62
28	2021	2,345	0.69	4.69
29	2022	2,454	0.72	4.65
30	2023	2,569	0.76	4.69
31	2024	2,689	0.79	4.67
32	2025	2,816	0.83	4.72
33	2026	2,948	0.87	4.69
34	2027	3,084	0.91	4.61
35	2028	3,225	0.95	4.57
36	2029	3,371	0.99	4.53
37	2030	3,521	1.04	4.45
38	2031	3,673	1.08	4.32
39	2032	3,828	1.13	4.22
40	2033	3,990	1.17	4.23
41	2034	4,158	1.22	4.21
42	2035	4,337	1.28	4.31
43	2036	4,525	1.33	4.33
44	2037	4,723	1.39	4.38
45	2038	4,934	1.45	4.47
46	2039	5,158	1.52	4.54
47	2040	5,399	1.59	4.67
48	2041	5,657	1.66	4.78
49	2042	5,925	1.74	4.74
50	2043	6,201	1.82	4.66
51	2044	6,487	1.91	4.61
52	2045	6,786	2.00	4.61
53	2046	7,095	2.09	4.55
54	2047	7,418	2.18	4.55
55	2048	7,754	2.28	4.53
56	2049	8,103	2.38	4.50
57	2050	8,467	2.49	4.49

Appendix 3

Elephant cropping and an opportunity to address an underlying cause of the poaching problem

Transcript of an e-mail communication from Peter Lindsey to various SVC stakeholders, 8 December 2006

I was not at the recent quota meeting, but I believe that the decision was taken to crop elephants annually starting this year, given parks permission. I believe that this represents a potentially very useful opportunity for the conservancy to utilize the meat to address one of the underlying causes of the severe poaching problem currently affecting the conservancy.

The statistics we are collecting on poaching within SVC show very clearly that there is a major spike in poaching incidences in the late dry season. This coincides with the time when food shortages in the neighbouring communal lands are at their worst. During the interviews we have done (through Steven Matema, the masters student working with us from UZ) with people in the communal lands who buy meat from poachers, one thing that came out strongly was that poached bush-meat was often the only option that people have for buying game meat (without walking many kilometers through the conservancy). Many people indicated that the lack of legally supplied game meat creates a huge market for poached meat. So, if game meat was cropped and sold at an affordable price on the boundary of the conservancy at several points close to population centres (or actually at the centres) during the late dry season, this may help to remove one of the key underlying causes for poaching.

As you all know, snaring is extremely wasteful (67% of animals killed in snares rot) and so replacing illegal supply of bush-meat with a legal supply should help achieve sustainability of off-take. I believe that in the long run the conservancy needs to do more to utilize protein resources occurring in the conservancy to address the causes of poaching. Potential protein sources are varied and include things like mopane worms, quelea and fish as well as game meat. I don't believe that this need represent a cost to the conservancy, as the protein could be sold and much of it is not utilized at the moment anyway.

I spoke informally to some people from Veterinary Services in Chiredzi this week and asked them what the legal issues would be regarding selling game meat outside of the fence. They said that they did not foresee a problem with this but that they advise that if the conservancy would like to sell meat outside of the fence, that it should meet with Veterinary Services to discuss the issue.

I suggest that the conservancy think seriously about developing a coordinated programme of making sustainably harvested game meat available for sale at an affordable price in the communal lands neighbouring the conservancy during the late dry season. The elephant cropping programme provides an excellent opportunity to do this. I believe that such a programme would be much more effective if it were coordinated, and did not involve individual ranchers doing their own thing. Perhaps this would be an opportunity to kick start the Save Valley Conservancy Trust by making meat available to them somehow, possibly as part of their proposed stake holding in the conservancy. The Trust really needs to get started, and perhaps this is an opportunity to do that.

I just wanted to share my thoughts on this issue and to see what the conservancy members thoughts are on this suggestion.

Appendix 4

Understanding the Complexity of Economic, Ecological, and Social Systems

A Précis of Holling (2001)

For any framework to be useful in assessing information about the internal factors and external influences that interact to determine sustainability, it must satisfy the following criteria –

- Be "as simple as possible but no simpler" than is required for understanding and communication.
- Be dynamic and prescriptive, not static and descriptive. Monitoring of the present and past is static unless it connects to policies and actions and to the evaluation of different futures.
- Embrace uncertainty and unpredictability. Surprise and structural change are inevitable in systems of people and nature.

The Adaptive Cycle

Three properties shape the adaptive cycle and the future state of a system –

- The inherent potential of a system that is available for change, since that potential determines the range of future options possible. This property can be thought of, loosely, as the "wealth" of a system.
- The internal controllability of a system; that is, the degree of connectedness between internal controlling variables and processes, a measure that reflects the degree of flexibility or rigidity of such controls and their sensitivity to perturbation.
- The adaptive capacity; that is, the resilience of the system, a measure of its vulnerability to unexpected or unpredictable shocks. This property can be thought of as the opposite of the vulnerability of the system.

These three properties – wealth, controllability, and adaptive capacity – are general ones, whether at the scale of the cell or the biosphere, the individual or the culture. They are the properties that shape the responses of ecosystems, agencies and people to crisis.

Four key features characterise an adaptive cycle, with its properties of growth and accumulation on the one hand and of novelty and renewal on the other –

(1) Potential or wealth increases incrementally in conjunction with increased efficiency but, in the process, an increasing rigidity develops.

(2) This results in an increasing vulnerability (decreased resilience) to external threats. The system becomes an accident waiting to happen. A break can trigger the release of accumulated potential and the system then moves abruptly into a phase of reorganization.

(3) Innovation then occurs in pulses or surges when uncertainty is great, potential is high and controls are weak, so that novel recombinations can form. This is where low connectedness allows unexpected combinations of previously isolated or constrained innovations that can blossom into new opportunities.

(4) Those innovations are then tested. Some fail, but others survive and adapt in the next phase of growth.

It is as if two separate objectives are functioning in sequence. The first maximises production and accumulation; the second maximizes invention and reassortment. The two objectives cannot be maximized simultaneously but only occur sequentially. And the success in achieving one inexorably sets the stage for its opposite. The adaptive cycle therefore embraces two opposites: growth and stability on the one hand, change and variety on the other.

Panarchy

Panarchy is the hierarchical structure in which systems of nature and humans are interlinked in never-ending adaptive cycles of growth, accumulation, restructuring and renewal. **The functioning of those cycles and the communication between them determines the sustainability of a system.**

A dynamic hierarchy serves two functions. One is to conserve and stabilize conditions for the faster and smaller levels; the other is to generate and test innovations by experiments occurring within a level. Each level is allowed to operate at its own pace, protected from above by slower, larger levels but invigorated from below by faster, smaller cycles of innovation. The whole panarchy is therefore both creative and conserving. The interactions between cycles in a panarchy combine learning with continuity.

Understanding hierarchies shifts attention away from the small-scale view that has characterised much of biological ecology to a multiscale and landscape view that recognizes that biotic and abiotic processes can develop mutually re-enforcing relationships over ranges of scale.

This process can serve to clarify the meaning of "sustainable development". Sustainability is the capacity to create, test and maintain adaptive capability. Development is the process of creating, testing and maintaining opportunity. The phrase that combines the two, "sustainable development", therefore refers to the goal of fostering adaptive capabilities while simultaneously creating opportunities. It is therefore a term that describes a logical partnership.

Human systems exhibit at least three features that are unique – features that change the character and location of variability within the panarchy and that can dramatically enhance the potential of the panarchies themselves. Those three features are **foresight, communication,** and **technology**.

Under conditions of crisis, the elements of a prescription for facilitating constructive change are as follows –

– Identify and reduce destructive constraints and inhibitions on change, e.g. perverse subsidies;

– Protect and preserve the accumulated experience on which change will be based;.

– Stimulate innovation and communicate the results in a variety of fail-safe experiments designed to probe possible directions in a way that is low in costs in terms of human careers and organizational budgets.

– Encourage new foundations for renewal that build and sustain the capacity of people, economies and nature to deal with change.

– Encourage an understanding of change and communicate it to people at different levels of administration and governance, engaging them in the process of change.

The era of ecosystem management via incremental increases in efficiency is over. We are now in an era of transformation, in which ecosystem management must build and maintain ecological resilience as well as the social flexibility needed to cope, innovate, and adapt.

Appendix 5

Reproductive Parameters and Population Model

The biological parameters which determine the population dynamics of elephants are summarised in the table below. Sources of data include Craig (1984, 1992), Dunham (1988), Hanks (1972), Laws (*et al* 1975), Lindeque (1988), Martin (2004) and Smithers (1983).

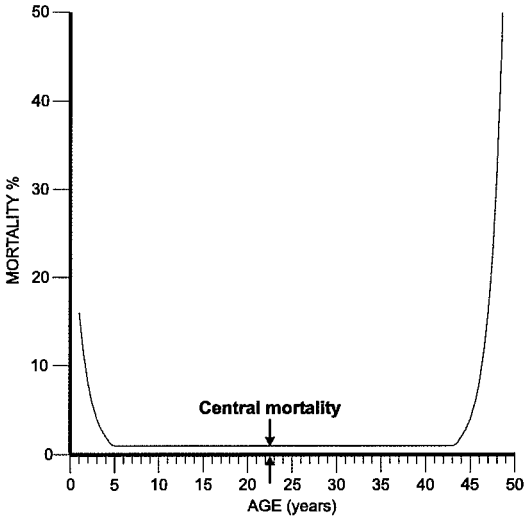
Reproductive Parameters for Savanna Elephant

Seasonal breeding	Most populations have a distinct breeding peak during the rainy season although births may occur in any month of the year
Gestation	22 months
Age at first conception	The median age is probably about 10 years old but in favourable conditions some females may conceive as early as 8 years of age. Laws (*et al* 1975) recorded conception being delayed until 19 years of age in a high density population in Uganda.
Age at first parturition	In populations not suffering density-dependence effects, about 50% of the 12 year-old females will produce calves and by the age of 15 all females will have produced their first calves.
Fecundity (adults)	The effect of seasonal breeding results in most elephants producing a calf every four years throughout their life after their first parturition. Fecundity may decline in the last few years before death.
Longevity	Elephants are generally assumed to live to about 60 years old. On the basis of age criteria deficiencies, Craig (1992) considered it more likely that the age of senescence was about 50 years old.
Mortality (adult females)	Other than in times of environmental stress (drought or disease), natural mortality is very low – probably less than 0.5% per annum
Mortality (adult males)	Mortality is slightly higher than in females. Young males between the ages of 20-25 years have been recorded as suffering a higher mortality than the other adults in the population.
Mortality (juveniles)	Data on calf mortality are difficult to collect. Work on elephant life tables suggests that in normal conditions juvenile mortality does not exceed 10% in the first year of life.

Fecundity: Lindeque (1988) derived average fecundities for the female elephants in Etosha National Park in 1983 and 1985 from two shot samples which included 103 and 214 females respectively. His finding was that, over their main breeding life span, the females were producing almost exactly one calf every four years (i.e. a fecundity of 0.25 including calves of both sexes). In 1983 no animals under the age of 12 years were pregnant or lactating but in 1985 one quarter of the animals in the 9-12 year old age group were pregnant. An assumption of the model is that there will always be sufficient adult males with which to breed – an assumption which may not be satisfied if, for example, sport hunting quotas are too high. In all of the population simulations carried out in this study a mean fecundity of 0.25 has been assumed for mature animals and the age at first parturition has been spread across the age groups in the manner shown below –

Age	0 - 9	10	11	12	13	14	15	16 - 43	44	45	46	47	48	49	50
Fecundity	0	0.03	0.08	0.125	0.175	0.225	0.25	0.25	0.25	0.225	0.175	0.125	0.08	0.03	0

Mortality: I use the term 'central mortality' to refer to the mortality during the main part of an elephant's lifetime from 5-43 years old (see figure opposite). Age-specific mortality in the model is set by means of a 'template'. It is only necessary to specify the central mortality for the population and the curves for juvenile mortality and senescence are adjusted automatically. In the example shown below, the mortality for each age class is derived by multiplying the number in the template by the central mortality of 0.5%. The mortality for males in the age classes 20-25 years is doubled.



Age	1	2	3	4	5	6 - 42	43	44	45	46	47	48	49	50
Template	16	8	4	2	1	1	1	2	4	8	16	32	64	100
0.5%	8	4	2	1	0.5	0.5	0.5	1	2	4	8	16	32	50

Given the above fecundities and mortalities, the rate of growth for an elephant population with a stable age distribution is slightly less than 5%. If all mortality is set to zero (apart from the animals which die at the age of 50 years), the maximum growth rate rises to 5.7%. The various recorded cases in the literature where elephant populations appear to have increased at up to 7% per annum (e.g. Hall-Martin (1980) – Addo National Park) are invariably in situations where a stable age distribution has not been achieved. Although, in theory, a fecundity of one calf every 3 years is possible such a rate is likely to be an episodic event. Synchrony of calving among females following a drought could also give the effect of a very high rate of increase for a single year. However, averaged over four years the result is no different to that which would be obtained with a fecundity of 0.25.

In the tables below I examine the effect of natural mortality on an elephant population. The fecundities are as specified on the previous page and the mortality template is as shown above (i.e. juvenile mortality increases with the central mortality). Once natural mortality exceeds the threshold at which the population can maintain itself, it is of more interest to express the decline as a 'half-life' i.e. the time it take the population to halve.

Response of an elephant population to changes in natural mortality

(a) Effects of changes in overall mortality on population growth rate

Natural mortality %	0	0.25	0.5	0.75	1	1.25	1.5	2	2.25	2.5
Rate of population growth %	5.70	5.11	4.56	3.99	3.42	2.84	2.26	1.09	0.00	Decline

Half-life (years)	150	100	50	25	10	9	8	7	6	5	4	3	2	1
Natural mortality %	2.5	2.6	2.8	3.5	5.4	5.8	6.1	7.0	8.1	9.8	11.8	15.4	21.5	36.6

The effect of varying juvenile mortality independently of adult mortality is examined below. The specified mortality in the first row is for animals under one year old. Mortality is halved for each subsequent age class up to 5 years old. The adult mortality has been set at 1%.

(b) Effects of changes in juvenile mortality on population growth rate

Juvenile mortality %	5	10	15	20	25	30	35	40	45	50
Rate of population growth %	4.35	3.95	3.51	3.07	2.62	2.16	1.65	1.17	0.40	-0.12

It is apparent from table (b) above that an elephant population can tolerate very high levels of juvenile mortality – it is only when mortality reaches 50% that the population begins to decline. The same is not true for adult female survival. A mortality of more than 2.5% causes the population to decline.

The population simulation model consists of 12 linked spreadsheets which operate as a 'birth-pulse' system. The spreadsheets are as follows –

A – The main reproductive, management and financial parameters are defined here.

B – The **starting population** is defined here by setting the numbers in all male and female age classes. The model runs on a counter for each iteration and in the first year it uses the population defined here. In all successive years, the 'running cohort' is the population from the year before (obtained after completion of the mortality calculations on spreadsheet **J**).

C – This sheet is used for density dependence and is not functional in the Save Valley model.

D – The calculation of the annual **breeding** of the population is done here. Average female fecundities for each age class (see table at the bottom of page 40) are arranged in a row vector and multiplied by the numbers of females in each age class. The resulting vector is summed to give the total crop of calves which is then halved to give the numbers of male and female calves (the sex ratio at birth is assumed to be 1:1). The numbers in each age class of the existing vectors of males and females are then advanced by one cell (i.e. each animal ages by one year) and the new crop of calves is inserted is the first cell of each vector. This is the population at the start of the management year.

Five spreadsheets then follow, each dealing with a particular management activity. All of these spreadsheets contain algorithms which deal with the problem of small numbers in each age class by ensuring that an integer number of animals is deducted from amongst the age classes. Where, for example, an offtake of (say) 0.5% demands that 7 animals must be removed from 20 age classes, the individuals are selected by random numbers with the probability of selection rising with each age class if previous random selections fail to produce the desired number.

E – The losses due to **illegal hunting** are calculated and subtracted from the population.

F – **Culling** entails the removal of animals in breeding herds (all males up to the age of 10 years and all females age classes). For males older than 10 years there is a probability less than unity which declines with age of their inclusion in the numbers culled. This sheet allows the specification of either a percentage offtake or a fixed number from the population to begin in any selected year. It also allows a the parameters to be changed in a later year and it provides for 'pulsed' culling where culls are carried out (say) once every two or three years.

Provision is made for a specified number calves between the ages of 3-10 years to be captured and sold as live animals as part of the culling operation.

G – This sheet handles the **live capture** of elephant herds. Males older 30 years are excluded. The facility has not been used is this study.

H – **Problem animal control** (PAC) includes males and females older than 14 years of age. The sheet allows females to be excluded from PAC and, for Savé Valley, all the simulations have included males only.

I – **Sport hunting**: Females have been excluded from all the scenarios examined for Savé Valley and it is assumed that only males aged 30 years and upwards will be hunted. The sheet allows for specification of a percentage offtake, or a set of percentage offtakes specified as part of 'hunting regime' or automatic quota setting through the control system defined on Sheet **R**. Mean tusk weights from the hunting offtake are calculated from age-specific allometric schedules.

This completes the spreadsheets analysing the management regime. For each sheet the total amount of meat, skin and ivory generated is calculated from allometric relationships and costed.

J – **Natural mortality** is the last of the spreadsheets on which population numbers are modified in the course of an annual cycle. The mortality schedules are as specified earlier in this Appendix and the analysis is performed simply by multiplying the numbers in each age class by the age-specific mortality in row vector operation. However, elaborate precautions are taken to handle the small numbers problem, i.e. if a total of 5 animals is required to die, the algorithms ensure that this number is taken from the full range of age classes.

This sheet also calculates the total amount and value of ivory expected to be recovered from animals dying naturally.

After natural mortality has been applied the final population vectors (males and females) become the starting population for the next year.

K – This sheet summarises each year of management giving the numbers at the start of the year, the numbers of animals dying in each category of management and through natural mortality, the population at the end of the year. The population growth rate is calculated and the results are graphically displayed.

The spreadsheet software is set to 'manual operation', and the model is advanced one year at a time by a keypress. By keeping the key depressed, the model will run continuously within the speed limitations of the computer. Any particular run of the model is terminated on this page by the Reset button.

L - This sheet keeps an overall record of the results for each year in any run of the model, including all of the population dynamics information, the management information (offtakes, mean tusk weights etc.) and a full financial record of all gross and net income earned from management.

R – This sheet performs automatic hunting quota setting and the method is described in a separate Appendix.

M-Q and **S-V**: These sheets are used for secondary data analysis and are not part of the population simulation.

Appendix 6

Elephant Biomass in Relation to Other Ungulate Species

Excerpt from a recent study done in the Mudumu North Complex on the Kwando River in the Caprivi, Namibia (Martin 2006)

The ecological carrying capacity for wildlife could be expected to be slightly higher than the sustainable stocking rate for cattle given that amongst the wildlife ungulate species are grazers, browsers and mixed feeders capable of deriving a greater productivity from the vegetation than cattle which are solely grazers.

In the past 30 years it has become apparent that the many of the stocking rates recommended for cattle by livestock specialists have, in fact, been unsustainable. The south-east lowveld of Zimbabwe which has an annual rainfall between 300-500mm cannot sustain cattle populations at stocking levels much higher than 1 livestock unit/20 ha over any length of time (Price Waterhouse 1994). Stocking rates have generally been higher than this on commercial farms in the area over the past 50 years and this has resulted in severely degraded grass swards and soil erosion.

The rainfall in the Mudumu North Complex is between 500-650mm and, on a simple linear ratio, the sustainable carrying capacity for grazers might be around 1 LU/14ha. Heath (1991) examined the metabolic biomass proportions of grazers, mixed feeders and browsers in a typical mopane savanna wildlife community and found the ratio to be about 27%:57%:15% respectively. Treating the mixed feeders as if they were 100% grazing animals and adjusting the carrying capacity only for the browsing animals in the wildlife system would result in a carrying capacity of 1 LU/12ha for the MNC. In order not to imply too great a precision and rounding down for the fact that the mixed feeders are not 100% grazing animals, a carrying capacity of about **1LU/10ha** might be a 'ballpark' figure for the Mudumu North Complex wildlife population – taking into account the presence of mixed feeders and browsers in the wildlife community.

At a present stocking rate of 1 livestock unit/17ha, the Mudumu North Complex would appear to be at about 60% of its wildlife carrying capacity. However, **the ceiling will be reached by the year 2012 if the elephant population continues to increase at its present rate**. A situation where elephants constitute 80% of the total wildlife metabolic biomass may not be optimum from a financial point of view or aesthetically desirable. The question is whether there is any objective method on which to decide this issue?

International safari hunting may provide a vehicle for examining the question. For reasons that are not always amenable to logic, some species are valued more highly than others in sport hunting. One management approach might be to placed a greater emphasis on enhancing the status of those species whose financial contribution per unit of metabolic biomass is the highest.

In the safari industry there are certain key species which are the "pegs" on which hunts of a given duration can be "hung". For example, elephant are seldom sold on hunts of less than 21 days – during the course of which it becomes possible to sell various other species most of which would not attract an overseas hunter to Africa in their own right. It would probably be incorrect accounting to say that the number of 'hunter-days' attributable to elephant is 21 because amongst the other species hunted there might be a few which themselves are "pegs" which could have generated shorter safaris in their own right (e.g. buffalo and lion). In order to compare the profitability of species in sport hunting it is necessary to take into account both the trophy fees for each species and the number of 'hunter-days' which the species generates, i.e. –

Species value = No. on quota x (Trophy fee + No. of hunter days x Daily rate)

The Namibian safari industry tends to differ slightly from others in Africa in that the daily hunting rates tend to be lower and the trophy fees tend to be higher.[9] In general safari hunting clients take both factors into account in choosing where to hunt.

The sport hunting values of the various ungulate species in the Caprivi,[10] including species which might be introduced, are estimated in the table below.[11] The analysis is based on the estimated maximum number of the species which could be carried in 100km^2 assuming that it is the only species to occupy the area.

Comparative Ungulate Species Value in Sport Hunting

Stocking Rate 10 ha/LU Daily rate US$ 1,000

#	Species	Livestock Units (LUs)	No. in 100km^2 N	Hunting Quota %	Hunting Quota N	Trophy fee US$	Hunter days N	Quota value US$	Rank #
1	Elephant	3.18	315	0.5	2	10,000	15	50,000	23
2	White rhino	2.47	405	0.5	2	7,500	10	35,000	26
3	Hippo	1.47	682	0.5	3	5,000	3	24,000	27
4	Black rhino	1.56	640	0.5	3	15,000	10	75,000	21
5	Giraffe	1.47	682	2.0	14	1,500	2	49,000	24
6	Buffalo	1.00	1,000	2.0	20	5,000	8	260,000	9
7	Eland	0.81	1,234	2.0	25	1,500	1	62,500	22
8	Zebra	0.54	1,837	5.0	92	750	1	161,000	13
9	Roan	0.51	1,956	2.0	39	5,000	2	273,000	8
10	Gemsbok	0.44	2,279	2.0	46	1,000	1	92,000	18
11	Sable	0.43	2,314	2.0	46	5,000	5	460,000	3
12	Wildebeest	0.47	2,122	2.5	53	1,000	1	106,000	17
13	Waterbuck	0.45	2,246	2.5	56	2,000	1	168,000	12
14	Kudu	0.41	2,467	2.5	62	750	1	108,500	16
15	Hartebeest	0.38	2,613	3.0	78	750	1	136,500	14
16	Tsessebe	0.31	3,211	3.0	96	1,500	1	240,000	10
17	Sitatunga	0.35	2,876	3.0	86	5,000	5	860,000	1
18	Lechwe	0.24	4,126	3.0	124	1,500	1	310,000	6
19	Puku	0.22	4,589	3.0	138	1,000	1	276,000	7
20	Bushpig	0.19	5,196	3.0	156	300		46,800	25
21	Warthog	0.18	5,623	3.0	169	500		84,500	19
22	Impala	0.15	6,790	3.0	204	500	0.5	204,000	11
23	Reedbuck	0.14	7,096	3.0	213	750	1	372,750	4
24	Bushbuck	0.13	7,622	3.0	229	500	1	343,500	5
25	Duiker	0.08	12,818	3.0	385	200		77,000	20
26	Oribi	0.06	17,374	3.0	521	500	0.5	521,000	2
27	Steenbok	0.05	20,539	3.0	616	200		123,200	15

9. For example, in Namibia the trophy fee for a buffalo is about US$5,000 but the daily rate for hunting is about US$500. In Zimbabwe, a buffalo trophy fee would be about US$2,000 but the daily rate for hunting would be about US$1,000. Thus, a 10 day buffalo hunt in Namibia would generate US$10,000 whereas in Zimbabwe it would generate US$12,000. However, this situation reverses if, for example, the number of hunter-days expected from a buffalo is 4 – the Namibia operator would earn US$7,000 and the Zimbabwean operator would earn US$6,000.

10. Carnivores and non-mammalian species are not included because they do not enter into the carrying capacity calculations.

11. Trophy fees are from Humavindu (2001) and hunter-days for each species are from Martin (2002).

The exercise in the table has been done for comparative purposes only and does not imply that any species population would necessarily achieve the implied density. However, the outcome is extremely interesting. Many of those species traditionally considered the most valuable in the safari industry turn out to be less valuable when metabolic biomass is taken into account. Elephants, for example, rank near the bottom of the list – although they command a high unit sport hunting value, their financial performance is reduced by the fact that few of them can be carried sustainably in the given area. The most valuable species are those whose unit safari hunting value is disproportionately high in relation to their metabolic biomass. They can be stocked at a fairly high level and, on paper at least, produce greater returns than other species. Under this criterion, sitatunga, oribi, sable, reedbuck – and so on – become the highest ranking species.

To make best use of these findings, I begin by arranging the species in the order of rank which they appear in the table on the previous page and assign some realistic maximum population numbers which they are capable of reaching under 'natural' conditions in the Mudumu North Complex (see table on the next page).

From the expected numbers, the metabolic biomass of each species population has been calculated. Working in order of the species value ranking, this metabolic biomass has been deducted sequentially from the total allowable metabolic biomass provided by a stocking level of 1 LU/10ha applied to the total available wildlife area in the Mudumu North Complex (3,647 km^2).

Beginning at the top of the table, the maximum potential sitatunga population on the Kwando River has been estimated at 75 animals. The metabolic biomass of this population is 26 livestock units which when deducted from the available biomass of 36,473 LUs leaves a balance of 36,447 LUs. The remaining species, in order of rank are treated in the same way. As the lowest valued species at the bottom of the table are approached, elephants (ranked 23rd out of 27 species) have been moved to the bottom of the table so that the desired biomass for all other species can be calculated before addressing the question of elephant numbers.

When this exercise was embarked upon, it was not known whether the assigned estimates for all the species populations would produce a total biomass greater or smaller than the so-called carrying capacity. It so transpired that, even using fairly optimistic population densities, the total metabolic biomass of all species excluding elephant adds up to less than the available carrying capacity. **This then provides a basis for deciding on the size of the elephant population**. By taking the remaining available livestock units after the values for all other species have been deducted and dividing the figure by the unit livestock value for an individual elephant, the result is that **a population of 3,093 elephants would complete the full carrying capacity for the Mudumu North Complex**. The present estimate for the elephant population is 6,000 animals.

A number of aspects of this exercise could be challenged – including the basis for deciding which are the most valuable species, the financial values given to each species in sport hunting and the estimates assigned to the 'maximum' population of each species. But perhaps none of these affect the underlying principle at stake – that of deliberately managing to increase the numbers of the most desirable species. The management tools to achieve this are limited but one obvious way is to ensure that inter-specific competition for resources is not constraining the growth of populations. In all the Rare and Valuable Species studies it has been emphasized that the increasing elephant population is a both a direct and indirect threat to other species. To create the 'space' for other more valuable species to expand means ensuring the elephant population takes up no more than its theoretical 'share' of the available resources.

Optimum Stocking of Ungulates in the Mudumu North Complex

Reference numbers in the first column refer to the species rankings established in Table 12
Reference numbers in the second column are the numbers assigned to species in Appendix 4

Effective wildlife area	3,647 km²	Floodplain	133	Riverine woodland	127
Stocking Rate	10 ha/LU	LUs	36,470	Daily rate US$	1,000

#	#	Species	Livestock Units (LUs)	Max Density N/km²	Pop. No. N_{max}	Metab mass LUs	LU Balance LUs	Hunting Quota %	Hunting Quota N	Trophy fee US$	Hunter days N	Quota value US$
1	17	Sitatunga	0.35	–	75	26	36,444	3.0	2	5,000	5	20,000
2	26	Oribi	0.06	–	200	12	36,432	3.0	6	500	0.5	6,000
3	11	Sable	0.43	0.25	912	394	36,038	2.0	18	5,000	5	180,000
4	23	Reedbuck	0.14	5	665	94	35,945	3.0	20	750	1	35,000
5	24	Bushbuck	0.13	5	635	83	35,861	3.0	19	500	1	28,500
6	18	Lechwe	0.24	50	6,650	1,612	34,250	3.0	200	1,500	1	500,000
7	19	Puku	0.22	3	399	87	34,163	3.0	12	1,000	1	24,000
8	9	Roan	0.51	0.25	912	466	33,696	2.0	18	5,000	2	126,000
9	6	Buffalo	1.00	2	7,294	7,294	26,402	2.0	146	5,000	8	1,898,000
10	16	Tsessebe	0.31	0.25	912	284	26,118	3.0	27	1,500	1	67,500
11	22	Impala	0.15	5	18,235	2,686	23,433	3.0	547	500	0.5	547,000
12	13	Waterbuck	0.45	10	2,600	1,158	22,275	2.5	65	2,000	1	195,000
13	8	Zebra	0.54	0.5	1,824	993	21,282	5.0	91	750	1	159,250
14	15	Hartebeest	0.38	0.2	729	279	21,003	3.0	22	750	1	38,500
15	27	Steenbok	0.05	5	18,235	888	20,115	3.0	547	200		109,400
16	14	Kudu	0.41	2	7,294	2,957	17,158	2.5	182	750	1	318,500
17	12	Wildebeest	0.47	0.2	729	344	16,815	2.5	18	1,000	1	36,000
18	10	Gemsbok	0.44	0.2	729	320	16,495	2.0	15	1,000	1	30,000
19	21	Warthog	0.18	2.5	9,118	1,621	14,873	3.0	274	500		137,000
20	25	Duiker	0.08	5	18,235	1,423	13,451	3.0	547	200		109,400
21	4	Black rhino	1.56	0.05	182	285	13,166	0.5	1	15,000	10	25,000
22	7	Eland	0.81	0.25	912	739	12,427	2.0	18	1,500	1	45,000
23	5	Giraffe	1.47	0.25	912	1,337	11,089	2.0	18	1,500	2	63,000
24	20	Bushpig	0.19	0.33	1,204	232	10,858	3.0	36	300		10,800
25	2	White rhino	2.47	0.05	182	450	10,408	0.5	1	7,500	10	17,500
26	3	Hippo	1.47		400	587	9,821	0.5	2	5,000	3	16,000
27	1	Elephant	3.18	0.89	3,093	9,821	0	0.5	15	10,000	15	375,000

Total US$ **5,117,350**

Gross return/hectare US$ **14.0**

NOTES

1. Sitatunga: 1 per km of river length, Kwando River straight line distance 75km

4, 6, 7. Reedbuck, Lechwe, Puku numbers based on floodplain area

12. Waterbuck numbers based on floodplain and riverine woodland area

26. Hippo: 5 per km of river length, Kwando River straight line distance 75km

Appendix 7

Elephant Male Trophy Hunting

The population model described in **Appendix 5** (page 40) has been used to test the effects of different levels of trophy male hunting quotas on the age structure of an elephant population and the mean trophy weight corresponding to different quota levels.

Tests were carried out on a population set initially at 592 animals in1993 with the age structure shown in **Fig.2a** (page 8) and the population was allowed to increase unchecked. A hunting selectivity of 25% for animals with larger tusks was used in the model. The selectivity was applied as follows –

(a) The proportion which each age class forms of the total number of huntable age classes is calculated:

$$P_a = 100 / (\text{No. of age classes}) = 100/21 = 4.76\ \%$$

For zero selectivity, each age class would contribute this proportion of whatever quota was set.

(b) The actual proportion expected to be contributed by the oldest age class (50 years) is then calculated as –

$$P_{50} = P_a + S\,.\,(100 - P_a) = 4.76 + 0.25\,(100 - 4.76) = 28.57\ \%$$

– where S is the selectivity expressed as a fraction.

(c) The next age class (49 years) contributes –

$$P_{49} = (100 - P_{50})\,.\,(1 + S\,.\,N_R) / (N_R + 1) = (100 - 28.57)\,.\,(1 + 0.25 \times 19)/20 = 20.54\ \%$$

– where N_R is the number of age classes remaining

(d) The next age class (48 years) contributes –

$$P_{48} = (100 - P_{50} - P_{49})\,.\,(1 + S\,.\,N_R) / (N_R + 1) = (100 - 49.11)\,.\,(1 + 0.25 \times 18)/19 = 14.73\ \%$$

(e) This process is continued until an expected proportion has been calculated for each of 21 age classes (the values are shown in the table on page 49). As hunting pressure is increased, it is not possible for the upper age classes to supply the number of animals demanded and so the required quota is progressively transferred to lower age classes until it has been satisfied.

Hunting quotas from zero to 0.8% of the total population were tested for a large unmanaged population (10,000 animals). A quota of 0.8% of the population results in the removal of all huntable males and at 0.7% the only surviving males are 30 years old . The 'optimum' quota is about 0.5% which allows some males in the population to reach an age of 39 years. The results are shown in the table and figure on the next page.

Being a 'small' population with an irregular age structure, a quota of 0.5% of the Save Valley elephants will result in no males older than 34 years in the year 2020. However, as time passes and the population is able to adjust, some males would reach the age of 40 years old with a 0.5% quota once a stable age structure has been achieved. It is of interest that once hunting quotas exceed 0.1% of the population, mortality from trophy hunting completely replaces natural mortality for males older than 30 years.

Response of the adult male age structure of a population to various levels of hunting quotas

Q – Quota (% of total population) N – Number actually hunted Total population 10,000 Selectivity 25%

	AGE CLASSES (years)																					
Q	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	Males	N
0.0	57	60	57	53	48	48	47	48	43	35	39	38	39	34	34	31	31	26	18	12	6	4,994	0
0.1	61	56	57	53	51	50	48	46	44	46	40	39	31	35	32	25	24	20	14	7	2	4,971	10
0.2	60	57	56	53	48	48	48	43	43	40	39	39	37	32	31	27	20	17	11	5	1	4,948	20
0.3	66	60	57	48	48	48	46	48	45	40	42	34	28	25	22	17	12	7	3	1	0	4,908	30
0.4	65	55	58	57	51	47	46	43	39	35	26	20	14	8	3	0	0	0	0	0	0	4,853	39
0.5	68	61	59	52	46	38	29	22	14	6	0	0	0	0	0	0	0	0	0	0	0	4,760	48
0.6	67	58	44	29	14	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4,671	59
0.7	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4,574	69
0.8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	4,556	68
	0.02	0.03	0.04	0.06	0.10	0.14	0.21	0.31	0.45	0.65	0.94	1.34	1.91	2.70	3.81	5.37	7.53	10.55	14.73	20.54	28.57	Selectivity %	
	14.7	15.3	16.0	16.7	17.5	18.2	18.9	19.6	20.4	21.1	21.8	22.6	23.4	24.1	24.9	25.7	26.4	27.2	28.0	28.8	29.6	Tusk wt. kg	

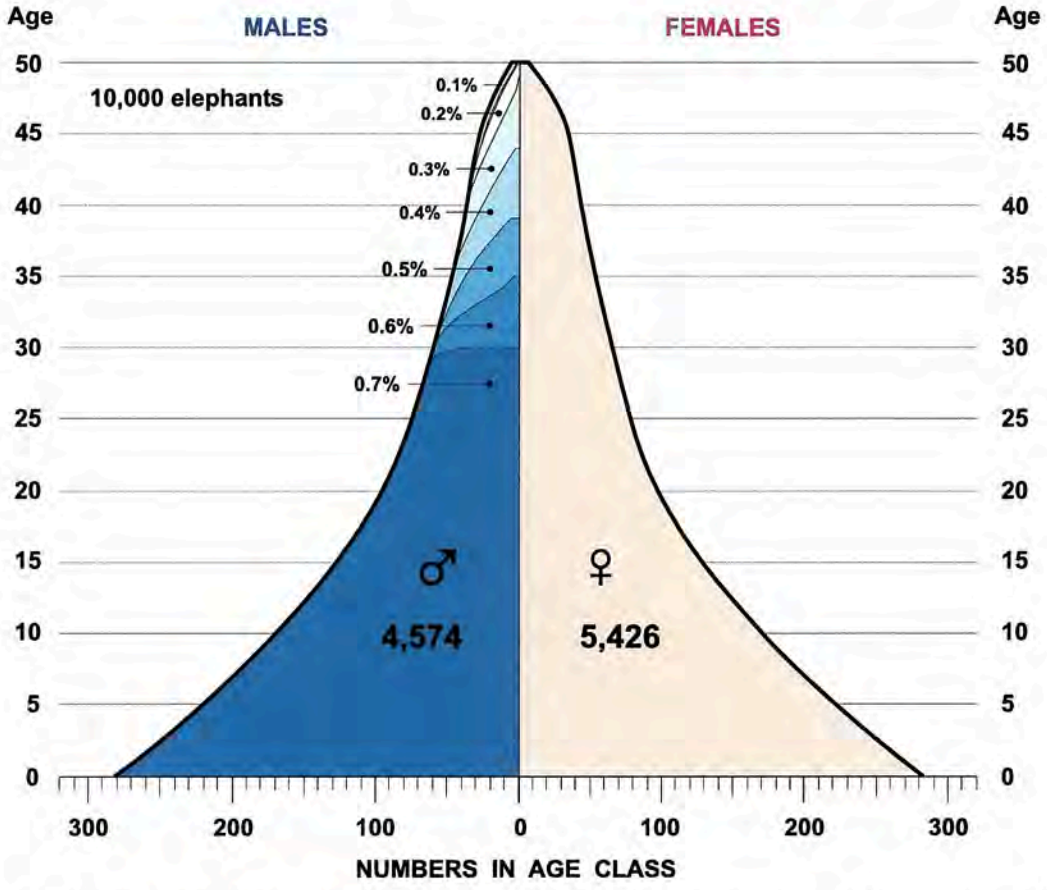


Fig.A7.1: Effects of trophy hunting on the age structure of an unmanaged elephant population

The figures (**Fig.A7.2 - Fig.A7.7**) which follow apply to the Savé Valley elephant population under a regime of no management (no culling) with hunting quotas ranging from zero to 0.5% of the total population. All of the population simulations assume a fixed offtake of 5 elephants hunted illegally and 5 elephants (males older than 15 years) killed as problem animals every year.

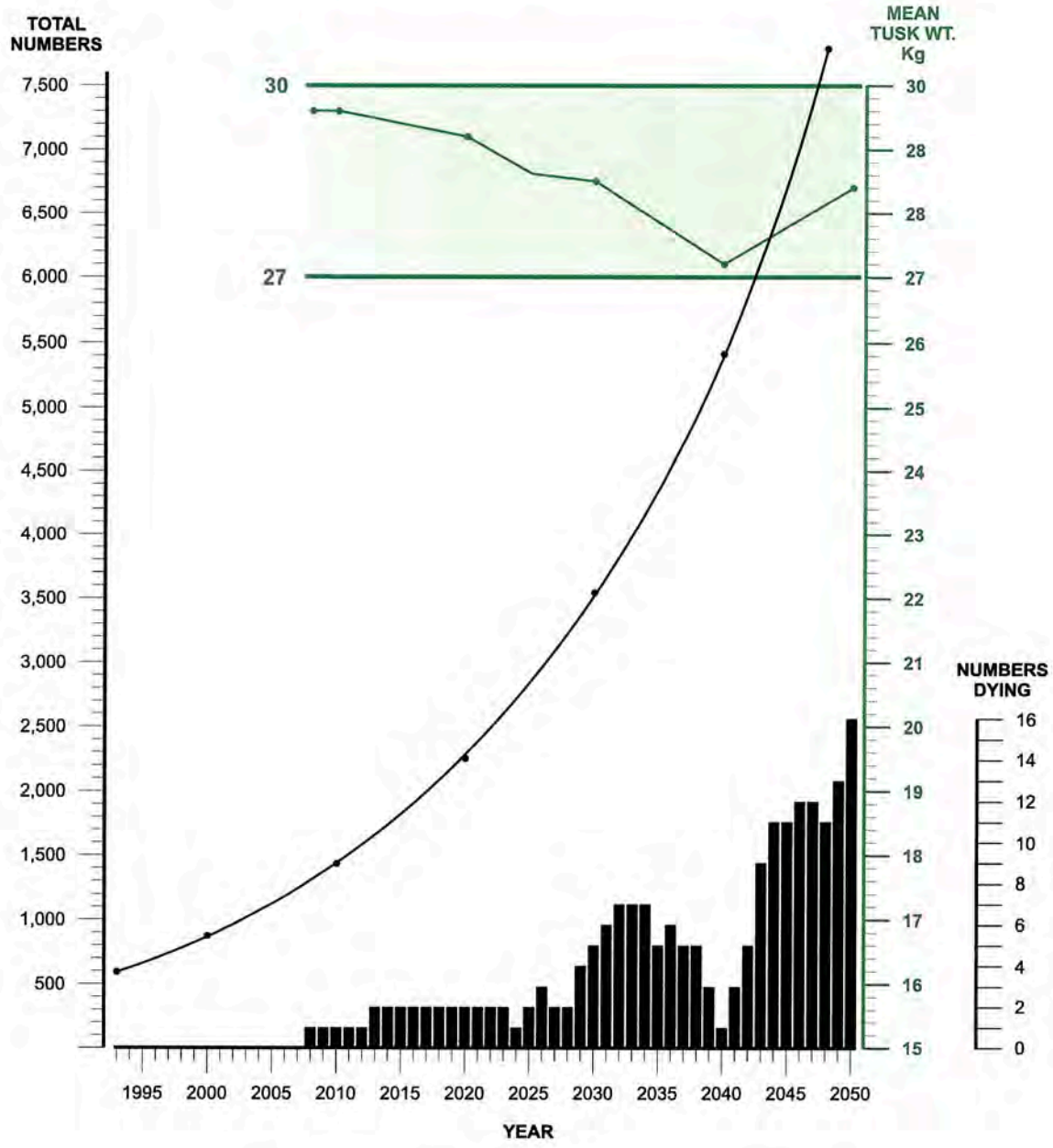


Fig. A7.2 : Mean tusk weights from natural mortality

Tusk weights range from 27-30kg

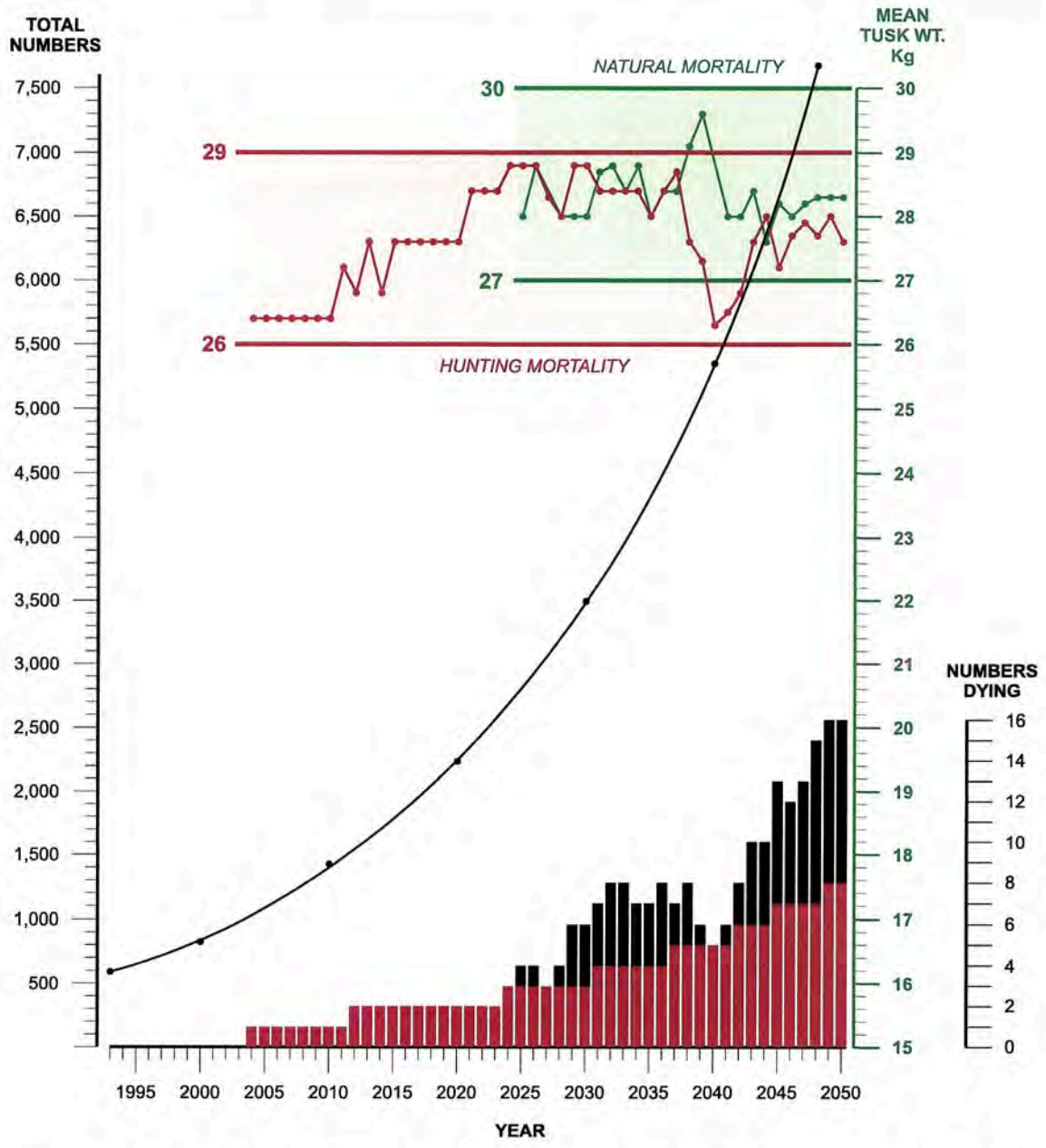


Fig. A7.3 : Mean tusk weights from natural mortality and a hunting quota of 0.1%

With a low hunting quota (0.1% of the population), some males die naturally producing tusks between 27-30kg. The mean tusk weight from hunting is between 26-29kg.

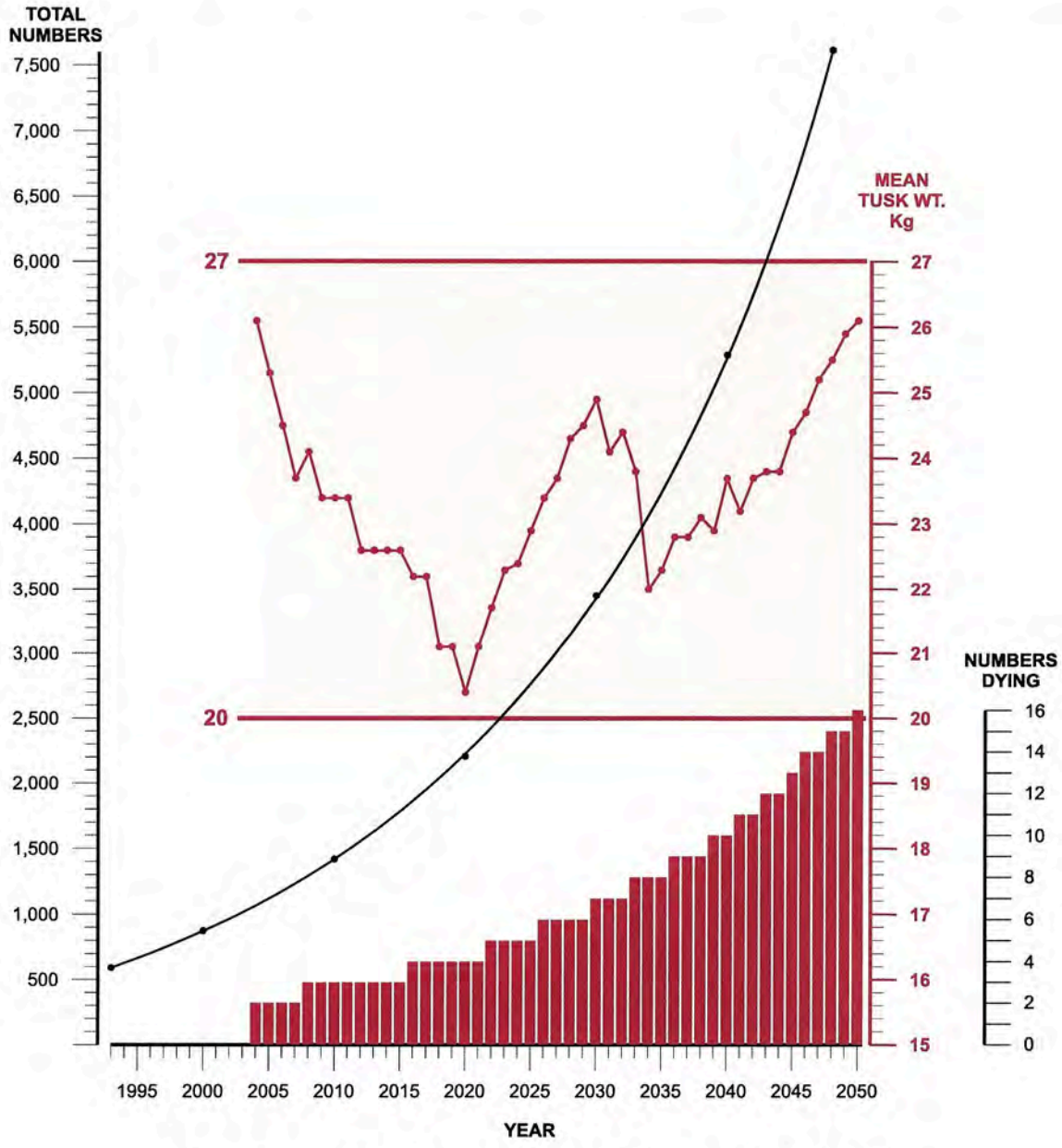


Fig. A7.4 : Mean tusk weights from a hunting quota of 0.2%

With hunting quotas of 0.2% or more, hunting mortality completely replaces natural mortality. The mean tusk weight from a quota of 0.2% lies between 20-26kg.

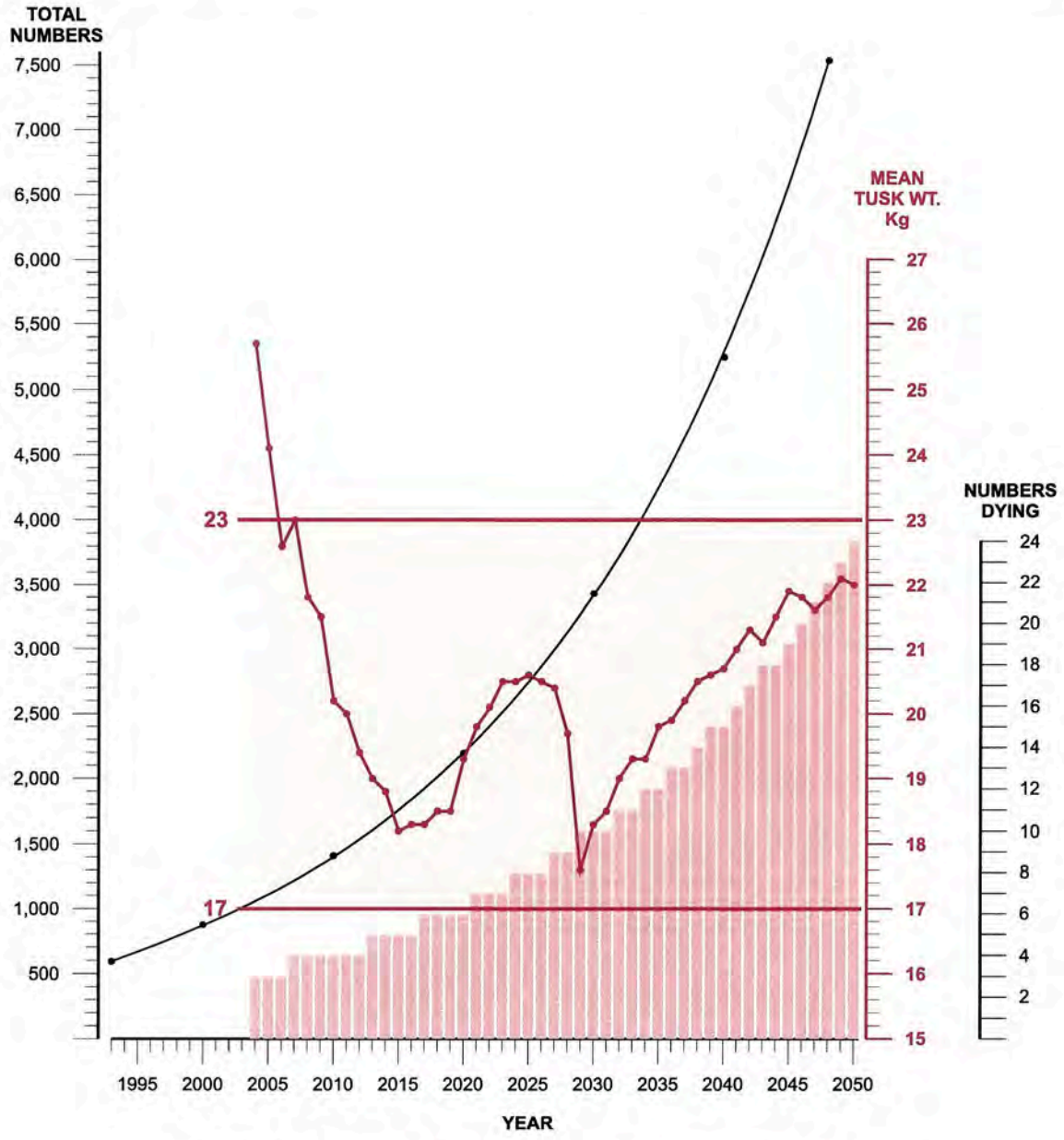


Fig. A7.5: Mean tusk weights from a hunting quota of 0.3%

The mean tusk weight from a quota of 0.3% lies between 17-23kg. Peculiar to the adult male age structure of the Savé Valley population are two vulnerable periods – the first occurs between 2010-2018 and the second between 2027-2032. If hunting quotas are not reduced during these periods, the hunting may 'collapse' for several years and the mean trophy size will be reduced to less than 15kg – the typical size of 30 year old males.

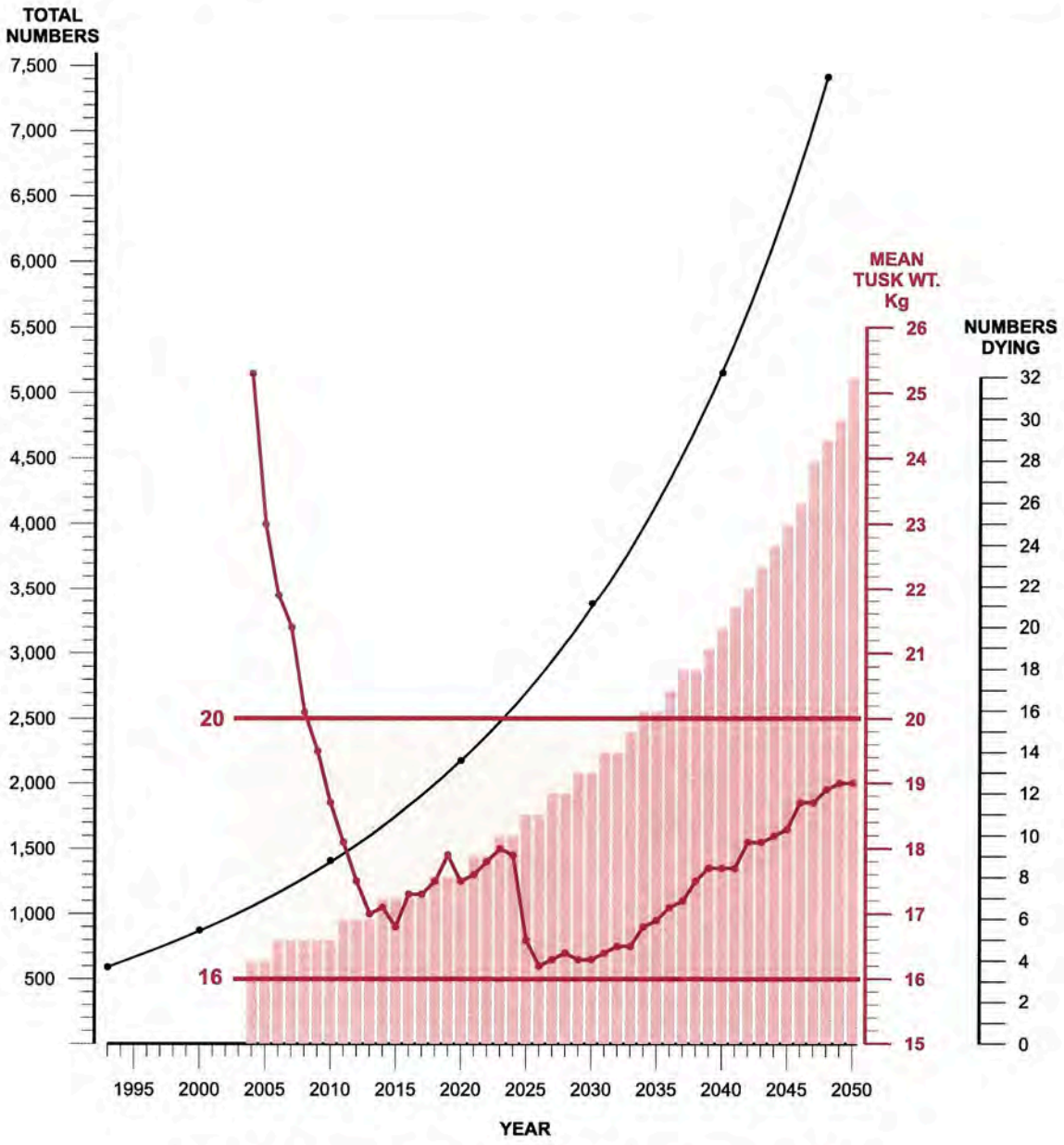


Fig. A7.6 : Mean tusk weights from a hunting quota of 0.4%

The mean tusk weight from a quota of 0.4% lies between 16-20kg. As a result of quotas being too high during the two vulnerable periods mentioned under the previous figure, the mean tusk weight remains lower than 18kg (less than 40lbs a side) up until about 2042.

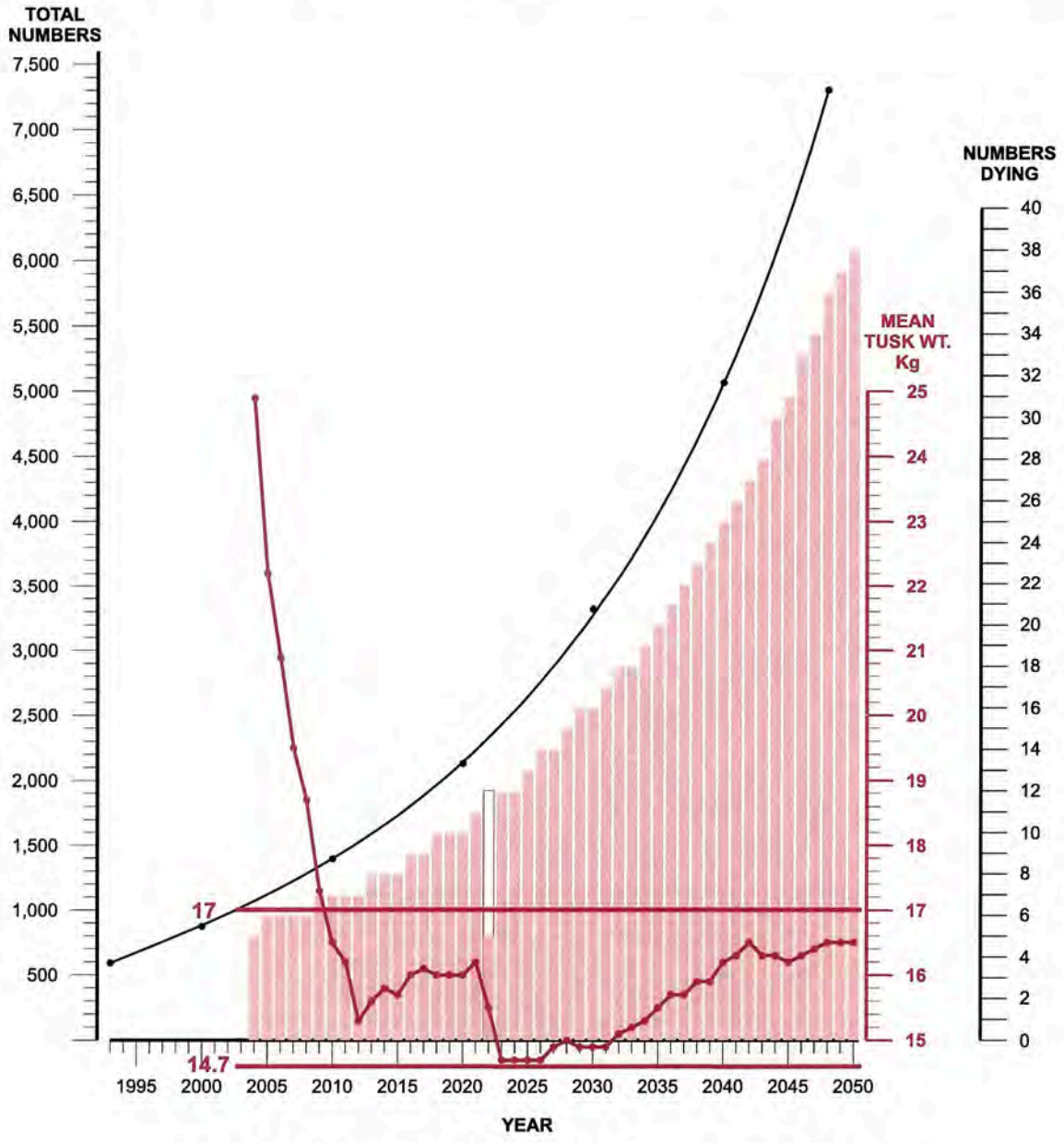


Fig. A7.7 : Mean tusk weights from a hunting quota of 0.5%

For the first 40 odd years after the inception of hunting in the Savé Valley, the mean tusk weight from a quota of 0.5% would lie between 15-17kg. In the year 2022, the model predicts that it would not be possible to obtain the set quota of 11 animals and only 5 trophies would materialise. In a population with a stable age structure the mean trophy weight for a quota of 0.5% should lie above 18kg – however, if such a quota were applied to the SVC population, it would not achieve this expected value until well after 2050. The automatic quota setting method (see **Fig.7**, page 14 in the main part of this report) averts this catastrophe.

Appendix 8
Automatic Setting of Hunting Quotas Based on Classic Control System Theory

Some years ago I gave a lecture on the application of control system theory at the University of Trondheim in Norway (Martin 1999c) a part of which is reproduced here as an introduction to the method.

ADAPTIVE MANAGEMENT: THE APPLICATION OF FEEDBACK

R.B. Martin (September 1999)

Introduction

Advocates of adaptive management are generally content to state that monitoring will take place and the results will be used as negative feedback. Bell (1997) has demonstrated the potential for positive feedback in a wildlife management system. The application of feedback to any system which is to be controlled is a complete science in its own right (cybernetics) – and ecosystem managers should be aware of the pitfalls which can arise when feedback is incorrectly applied and be aware of the elements which go into designing effective and efficient control systems.

A Control System

In the schematic control system shown in **Figure 1**, a nominal input is applied to the system to be controlled. The actual output from the system is compared with the desired output and the difference is fed back to the input via a "Transfer Function" which calculates the amount of feedback to apply in order to bring the desired and actual outputs closer to each other. The feedback (which is now in the same units as the 'input' after conversion through the transfer function) is added to the nominal input to the system to make the correction.

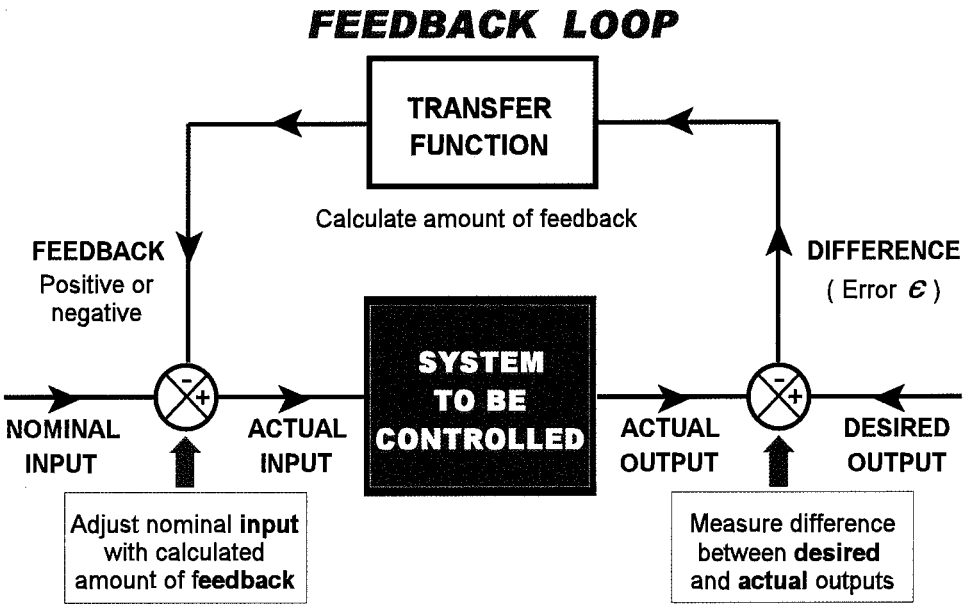


Figure 1: ELEMENTS OF A CONTROL SYSTEM

If, for example we were to apply this to an ecosystem in which we were attempting to control elephant numbers in order to conserve mature trees, the nominal input might be a reduction of the elephant population by 1,000 animals. The output would be measured in actual tree cover and this would be compared with the desired amount of tree cover. The difference would be fed through the transfer function and applied as feedback in the form of an additional number of elephants to be removed. From the outset, time lags would play a large part in this control system.

Feedback in Control Systems

The simplest form of feedback system is one which simply makes proportional corrections to the inputs based on the magnitude of the 'error'. The Transfer Function (F) results in feedback given by –

$$F = a.\epsilon$$

– where a is a constant and ϵ is the error.

The shortcomings in such a method are –

- it makes no allowance for any inherent time lags in the system it is controlling;
- when it reaches the point where the desired output is the same as the measured output, at this stage the error becomes zero and there is no quantity available to maintain the feedback;
- the manager has to wait until once more the system strays away from the desired condition before he can apply a proportional amount of correction. Because of this, there is a temptation to build a very high 'gain' into the system – i.e. small positive or negative differences from the desired output are hugely amplified and fed back to the input.

During the build-up phase the feedback is positive(see **Figure 2**): negative feedback only starts to operate once the actual output exceeds the desired output. Control based only on the error usually results in the actual output overshooting the desired output during this build-up phase.

Problems then arise because of the "Dead Zone" either side of the desired output level. Only when the actual output exceeds some threshold will the feedback mechanism 'kick in' and, by this time, the actual output is usually well on its way to being more (or less) than the manager would like. This results in an oscillating output around some mean value and if the system has a time lag in responding to changes in the input (as all real life systems do) the oscillations can become relatively large.

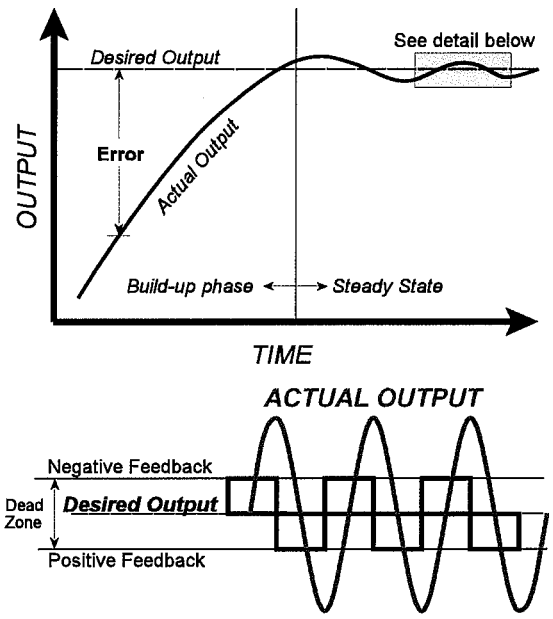


Figure 2: Control based on the error

To start improving matters, the first thing we need to know about is the inbuilt time lag of the system. In a simple engineering case, we would apply a fixed input at a particular level and measure how quickly the system adjusts to that input. To use engineering nomenclature, we determine the response (time-constant) of the system to a step-function – which is the time taken for the response to reach 63.2% of its final level.

$$\tau = 1\text{-}e^{-1}$$

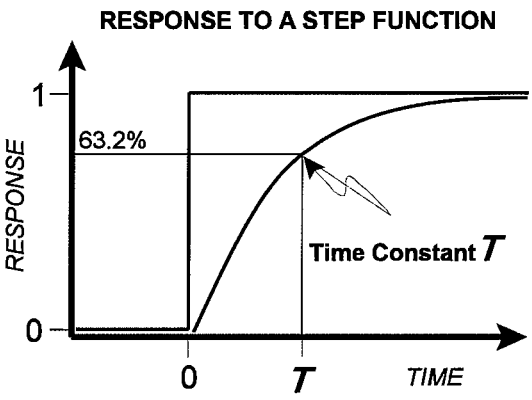


Figure 3: Response to a step function

Within ecosystems there will be multiple time constants — trees and elephants grow slowly, mice and grasses run on cycles of a year or less. However, depending on the aspect of the ecosystem to be managed, it is not inconceivable that some fixed perturbation could be applied and the response measured – this would be good adaptive management. For example, if the concern was the effects of elephants on trees, it might be decided to remove a known number of elephants and measure the rate at which the trees regenerated.

For the next improvement, we need to add a few 'strings to our bow' beyond simply relying on the 'error' for feedback. The minimum set of information which will provide a 'complete' control system is –

(1) the error – the difference between the actual condition and the desired condition;

(2) the derivative of that error – the rate at which the change is taking place; and

(3) the integral of that error – the past history of the departures from the desired condition.

Mathematically, our control function can be expressed as –

$$F = \alpha e + \beta \frac{de}{dt} + \gamma \int_0^t e.dt$$

where – α, β and γ are constants;
e is the error; and
t is time

I don't want the introduction of mathematics (calculus, in particular) to become the point of departure from a commonsensical understanding of the concepts I am trying to put across. The simple elements of adaptive management from an ecosystem manager's point of view are that he/she should be aware not only of the difference between the actual and desired condition, but also how quickly change is taking place and the past history of changes.

Let us examine the behaviour these three parameters display during the build-up phase in a control system (**Figure 4**). Imagine a system where the actual condition is a long way from desired condition and where feedback, which has contributions from all three parameters, is being applied to bring the system to the point where it is controlled (we will return to the 'how' in a moment).

At the start, the error is large and the integral of the error is zero (the integral is no more than the area under the curve – see inset at the bottom of Fig. 4). As the actual output begins to move towards the desired control level, the derivative is high – i.e. the slope of the trajectory is steep. The error and the derivative of the error are providing the major influence on the feedback – which, at this stage, is positive.

In the intermediate phase when the actual output is still some way from the desired output all three parameters are contributing to the control.

As the output gets closer to the desired level, the error decreases and, if the control system is correctly designed, the curve begins to level out and the derivative decreases.

The integral, which has been steadily increasing in value over the past history of this trajectory, now begins to take over control As the actual level reaches the desired level, the error and the derivative of the error disappear completely. The integral, however, is not zero. It has stopped increasing because the area between the actual level and the desired level is zero and it now sits at a constant value. It is this value which maintains the 'input' to the system at exactly the correct amount to achieve control.

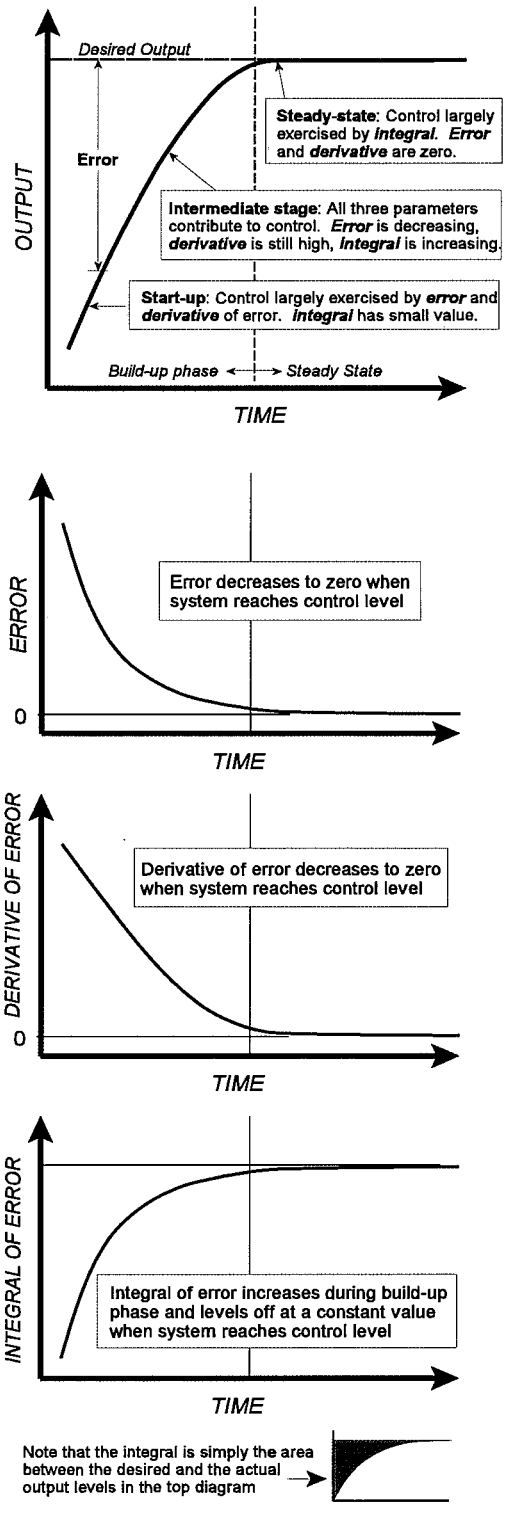


Figure 4: Effects of error, derivative of error and integral of error on control system

So much for the 'start-up'. In real life we will not be dealing with too many start-ups but will more interested in maintaining control of a working system. Each of the three parameters plays a particular role in doing this (**Figure 5**). Imagine our actual level now moving above the desired level – caused by some externality. The negative feedback swings into action. If the change is large the negative feedback will be provided by the error and, depending how fast the change takes place, the derivative will also contribute to the feedback. If the change happens rapidly – i.e. our actual level suddenly begins to move sharply away from the desired level, the derivative provides immediate negative feedback – even for small changes. If the change happens gradually, the integral responds by subtracting from its nominal value the small increment in area caused by the output level being above the desired level and slightly lowering the overall input.

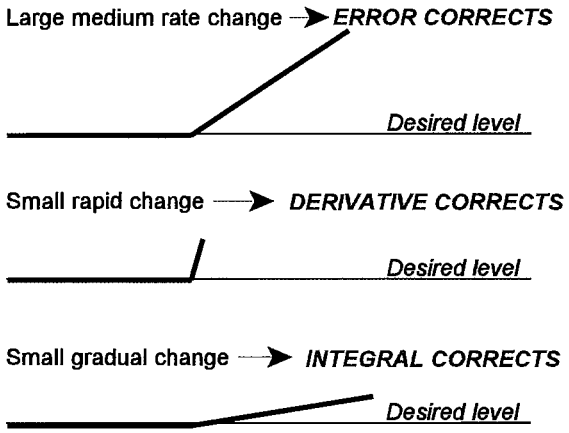


Figure 5: Control under steady-state conditions

I think you can see the practical application of this without worrying about the mathematical niceties. In real life we apply such control systems automatically and unthinkingly all the time. In driving a motor car from A to B we will go through the start-up process, i.e. bringing our car up to speed smoothly. We will accelerate at the start (when the error and the derivative of the error are large) but as we approach our desired cruising level the foot will relax on the accelerator pedal to exactly that level which maintains the speed (the integral is now working). Suddenly we become aware of a speed-trap ahead (our cruising speed is above the speed limit) – the derivative takes over and we do a rapid deceleration. Because of the instantaneous nature of this adjustment, the integral term is hardly affected and within a short while control is restored at the original cruising speed.

What is now left to discuss is the choice of constants governing the relative contributions which the error, the derivative of the error and the integral of the error should make to the feedback system.. These are dependent on the time-constant of the system to be controlled. In the engineering world, elegant formulae exist for calculating the values in a way which give critical damping to the control system – i.e. at start-up it will increase at the maximum rate possible to reach the desired level and, for all subsequent perturbations, it will inject negative (or positive) feedback in exactly the right doses to restore control.

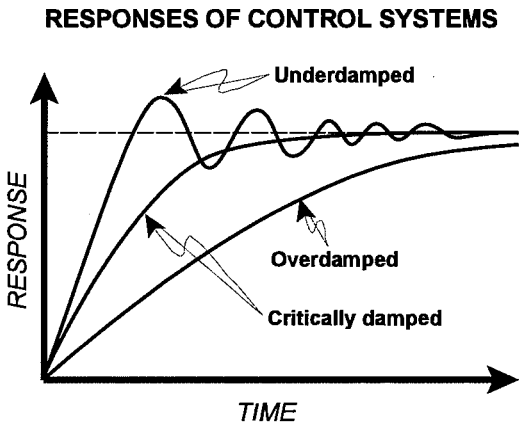


Figure 6: Influence of constants on performance of control system

However, this optimisation process is not denied to the ecosystem manager who does not have a grasp of Laplace Transforms or functions of a Complex Variable. In setting up simple models, I have found that, with a few iterations, workable values for the three constants can be arrived at with little difficulty.[12] It is quite easy to set two of the constants to zero and watch how the system behaves under the influence of the remaining one (e.g. the integral), in order to get quick approximations.

Conclusion

All of this shows considerable promise for looking at such concepts as resilience, processes and time lags in ecosystems. But it is necessary to watch out for the trap of conceiving of everything in terms of "equilibrium resilience" as defined by Holling and Meffe (1996). Whilst it is useful, if not essential, to grasp the elements of control systems, it would be an abuse of adaptive management to apply it to constraining ecosystem behaviour to narrow limits as is so laudable in a an engineering control system design. The ecosystem is itself a dynamic living entity — not passive in the nature of an engineering system. Many of the perturbations it responds to are not applied by man - variations in climate being one example. "Ecosystem resilience" is a far broader concept allowing for wide swings in the state of the measured variable(s) which encapsulate the status of the ecosystem. And how to accommodate this concept needs thought.

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12. The author has used this approach to model self-regulation in elephant populations. The constants can be adjusted to provide constant regulation at any given level or, alternatively, to cause the population to follow stable limit cycles of any frequency and amplitude (Caughley, 1976).

I have applied exactly such a system to the setting of hunting quotas in this study. The parameter which we wish to control is the mean tusk weight of trophies and this is also the variable we have to measure. The transfer function is –

$$F = A \,.\, \epsilon + B \,.\, \frac{d\epsilon}{dt} + C \,.\, \int \epsilon \,.\, dt \quad \ldots\ldots\ldots\ldots \quad ①$$

where – ϵ is the difference between the actual mean tusk weight and the desired mean tusk weight averaged over all of the hunting trophies in any given hunting season

and A, B and C are constants

This function is used to modify the quota Q_i in any given year as follows –

$$Q_i = Q_{i-1} + G \,.\, F_{i-1} \quad \ldots\ldots\ldots\ldots\ldots\ldots \quad ②$$

where – Q_i is the hunting quota for the year concerned (% of the total population);

Q_{i-1} is the hunting quota for the previous year;

G is a constant (the "gain" of the system); and

F_{i-1} is the value of the transfer function derived from the previous year

If the value of F_{i-1} is such that it would result in a negative quota, a logical condition is used to limit the value of Q_i to 0.1%.

The system is arithmetically simple to apply. Three columns are set up and, in the first, the error is tabulated – i.e. the difference between the desired mean tusk weight and the actual mean tusk weight for the year concerned. In the second the derivative is calculated. Because the minimum time interval for the population modelling (and quota setting) is one year, the term ***dt*** in the derivative can be ignored and the value required is simply the difference between the last year's error and the present year's error. Of course there is no value for the derivative in the first year of the exercise because the slope of the curve can only be determined from two data values. In the third column the integral is simply the cumulated sum of all errors to date.

The three terms are added together in a fourth column using the constants A, B and C shown in formula ① above. In a fifth column the quota for the next year is set using formula ②. An example of the process is given in **Table A8.1** on the following page.

I included a fourth term in the quota modifier expression based on hunting success which is not shown in Table A8.1 . The quota is adjusted downwards if the full hunting quota set for any particular year is not achieved. However, in the population simulations this situation did not arise so it is not shown in the table.

In the table below the population is subjected to a cull of 60 animals per year from 2007-2020 and 2.75% of the population from 2021 onwards. This is the management regime recommended in the main section on culling (page 15). The fluctuations in the quota are caused by the irregular shape of the population age structure (see **Fig.2**, page 8).

Application of automatic quota setting

Required mean tusk weight (kg)				20.0	A	B	C		G
		QUOTA		Constants	1.0	10.0	0.03	F	0.03
Year	Population	Q_{t-1}	No.	MTW	Error	Derivative	Integral	Function	Q_t
2007	1,176	0.20	2	20.7	0.7	0.0	8.6	0.96	0.23
2008	1,167	0.23	3	19.6	-0.4	-1.1	8.2	-11.15	0.10
2009	1,158	0.10	1	21.1	1.1	1.5	9.3	16.38	0.59
2010	1,142	0.59	7	19.9	-0.1	-1.2	9.2	-11.82	0.24
2011	1,130	0.24	3	18.9	-1.1	-1.0	8.1	-10.86	0.10
2012	1,118	0.10	1	20.4	0.4	1.5	8.5	15.66	0.57
2013	1,099	0.57	6	19.6	-0.4	-0.8	8.1	-8.16	0.32
2014	1,081	0.32	4	19.3	-0.7	-0.3	7.4	-3.48	0.22
2015	1,061	0.22	2	20.0	0.0	0.7	7.4	7.22	0.44
2016	1,038	0.44	5	19.3	-0.7	-0.7	6.7	-7.50	0.21
2017	1,015	0.21	2	20.0	0.0	0.7	6.7	7.20	0.43
2018	989	0.43	4	20.0	0.0	0.0	6.7	0.20	0.43
2019	962	0.43	4	20.0	0.0	0.0	6.7	0.20	0.44
2020	931	0.44	4	20.7	0.7	0.7	7.4	7.92	0.68
2021	929	0.68	6	20.6	0.6	-0.1	8.0	-0.16	0.67
2022	927	0.67	6	21.5	1.5	0.9	9.5	10.79	1.00
2023	922	1.00	9	21.4	1.4	-0.1	10.9	0.73	1.02
2024	917	1.02	9	21.0	1.0	-0.4	11.9	-2.64	0.94
2025	915	0.94	9	21.4	1.4	0.4	13.3	5.80	1.11
2026	912	1.11	10	20.9	0.9	-0.5	14.2	-3.67	1.00
2027	907	1.00	9	21.3	1.3	0.4	15.5	5.77	1.18
2028	901	1.18	11	19.7	-0.3	-1.6	15.2	-15.84	0.70
2029	900	0.70	6	18.1	-1.9	-1.6	13.3	-17.50	0.18
2030	902	0.18	2	19.6	-0.4	1.5	12.9	14.99	0.63

Under some circumstances the control system performs slightly better when the gain of the system (Constant G) or the constant determining the contribution of the integral (C) is reduced – this prevents undamped oscillations in the quota at high levels of problem animal control.

Appendix 9

Effects of various Forms of Exploitation on the Age Structure of an Elephant Population

All of the following analyses are based on the population model described in **Appendix 5** (page 40). In order to obviate the effects of an irregular age structure such as that of the Savé Valley elephants, a large population of 10,000 animals has been used. The results are directly applicable to a smaller population of 1,000 animals simply by dividing all numbers by 10.

The age structure of an elephant population subjected to no exploitation is shown in **Fig.A9.1** below. This is the stable age structure of a population increasing at slightly under 5% per annum. Central mortality (see page 41) is 0.5% and average female fecundity after puberty is 0.25 calves per year. There are slightly more females than males because of a differential mortality between the sexes during the ages 20-25 years old – male mortality has been increased by 0.5% for these 5 years to cater for intra-specific fighting.

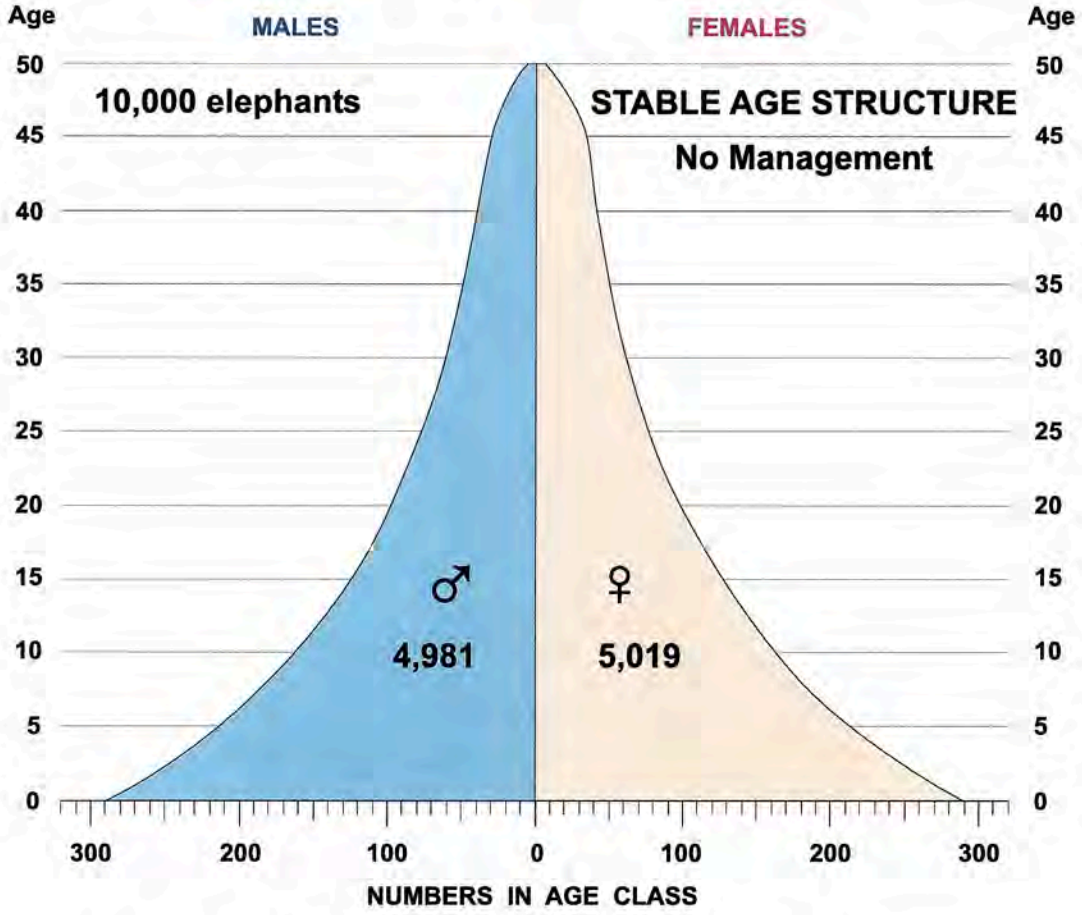

Fig.A9.1: Stable age structure for an unexploited elephant population

In the population model it is assumed that illegal hunting affects all animals in the population with an equal probability of being killed. Under this assumption, illegal hunting has no effect on the shape of the age structure but simply affects the growth rate of the population.

Culling

The culling of complete breeding herds causes the age structure of the population to be skewed towards males. Culling affects all females and all males up to the age of 10 years with equal probability of death. For males older than 10 years, the model uses a declining probability with age of a male being included in a culling operation. In practice, males carrying large tusks are almost invariably excluded from culling because of their value as sport hunting trophies.

Under a culling offtake of 3.3% and an illegal hunting offtake of 0.1%, an initial population of 10,000 animals increases for about 22 years reaching a peak of 11,200. Thereafter it declines, falling below 10,000 animals after 54 years. The age structure shown in **Fig.A9.2** below is that which is in place in the year when the population falls below 10,000 animals (Year 54). The sex ratio is 5.8 males : 4.2 females.

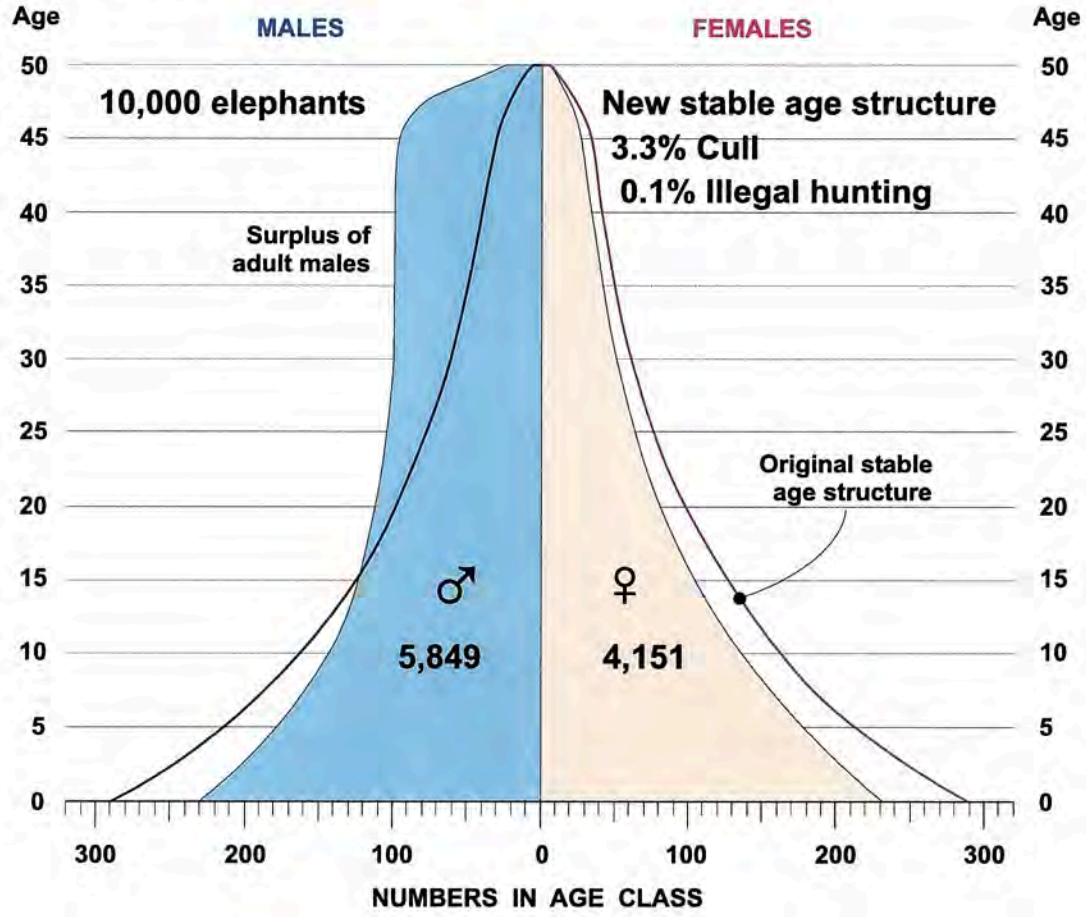

Fig.A9.2: Age structure under culling regime

Problem Animal Control

For the purposes of modelling the Savé Valley population, problem animals are defined as males aged 15 years and older. Females are excluded from PAC.

A PAC offtake of 0.25% of the total population has the effect of reducing the surplus of males shown in the previous figure and causing the shape of the age pyramid to widen slightly for all age classes other than those included in PAC (**Fig.A9.3** below).

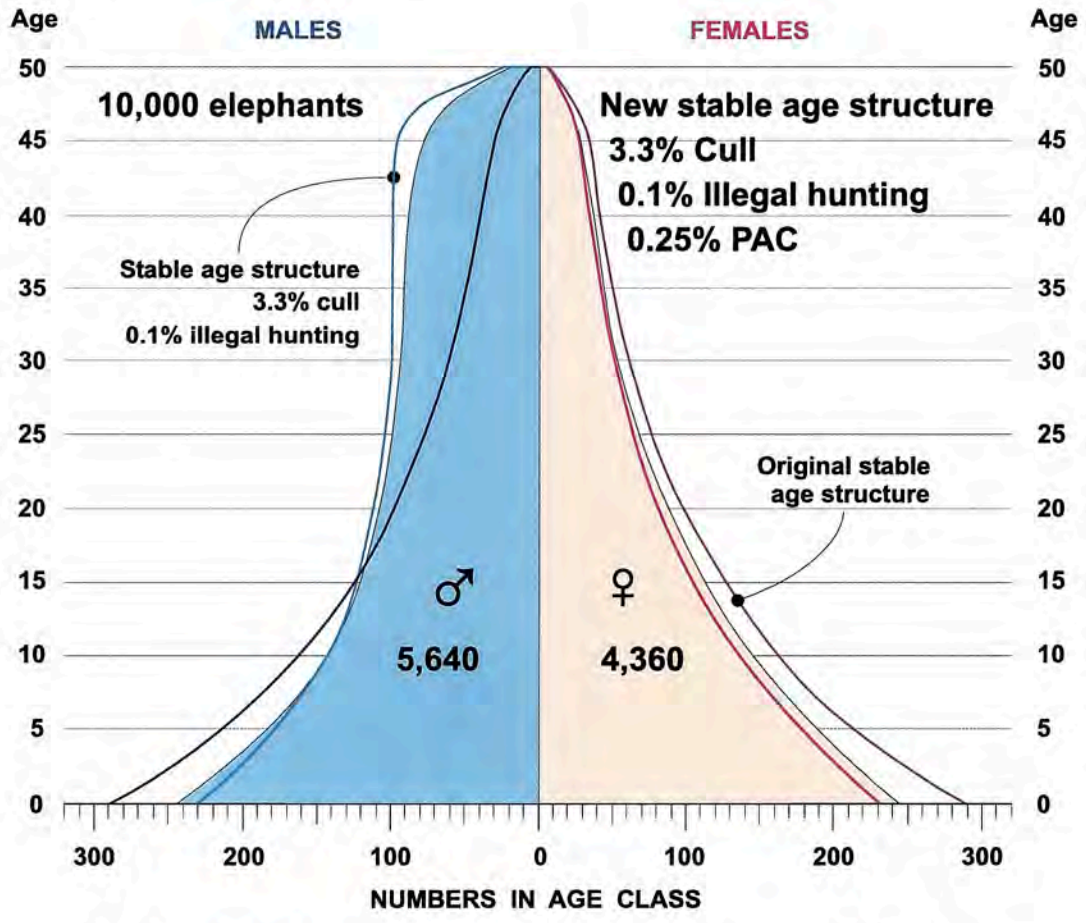

Fig.A9.3: Added effect of Problem Animal Control on the Age Structure

This age structure is used as the starting point for examining the effects of different levels of trophy hunting quotas in **Fig.A9.5** on page 68.

Trophy hunting

In the absence of culling, the maximum sustainable trophy hunting quota from an elephant population is about 0.5% (**Fig.A7.1**, page 49) – this should yield a mean tusk weight of slightly under 19kg per side (see **Fig.12**, page 20). At this level of hunting no adult males survive beyond 40 years of age. The sustainable trophy quotas possible from a population subjected to culling are more than double this – 1% or more. In **Fig.A9.4** below, the population is subjected to a 3.3% culling offtake[13] and there is no illegal hunting or problem animal control.

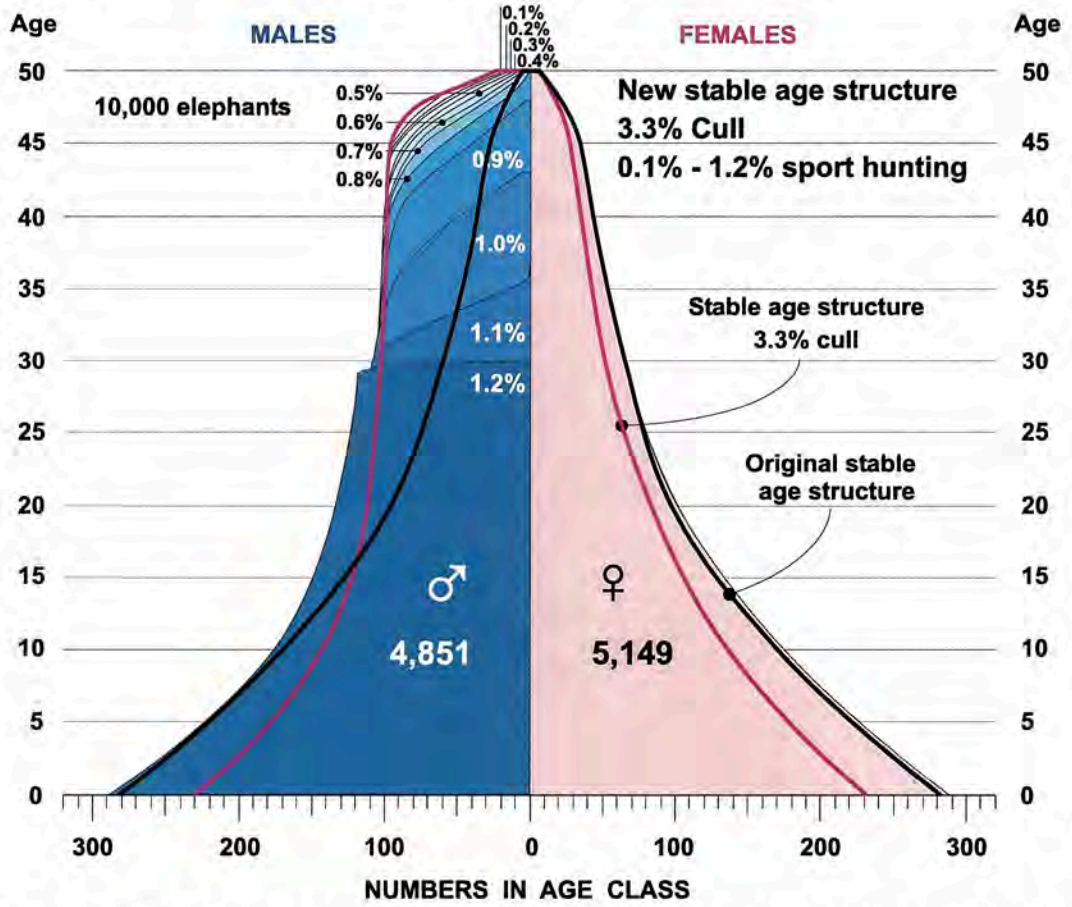

Fig.A9.4: Effect of hunting quotas on population age structure with a 3.3% culling offtake

At a quota of 1.2% of the population, all males reaching the age of 30 years are killed in that same year and none survive to become 31 years old. However, a quota of 1% of the population ensures that some males survive to over 40 years old and, for quotas less than 0.9% of the population, there will always be some males surviving to 50 years old and dying naturally. Under this regime, the age structure expands significantly in the lower age classes and closely approximates that of the 'unculled' population.

13. When the two highest quota levels (1.1% & 1.2%) are applied, a cull of 3.3% is no longer able to cause the population to decrease. For these two values, the culling offtake was increased to 3.5% 25 years after the start of culling (if 3.5% is applied at the start the population declines before the age structure can stabilise).

In examining the implications of this for the Savé valley elephants, it is necessary to take into account both illegal hunting and problem animal control. Using the stable age structure shown in **Fig.A9.3** tests have been done for various percentage offtakes (**Fig.A9.5** below).

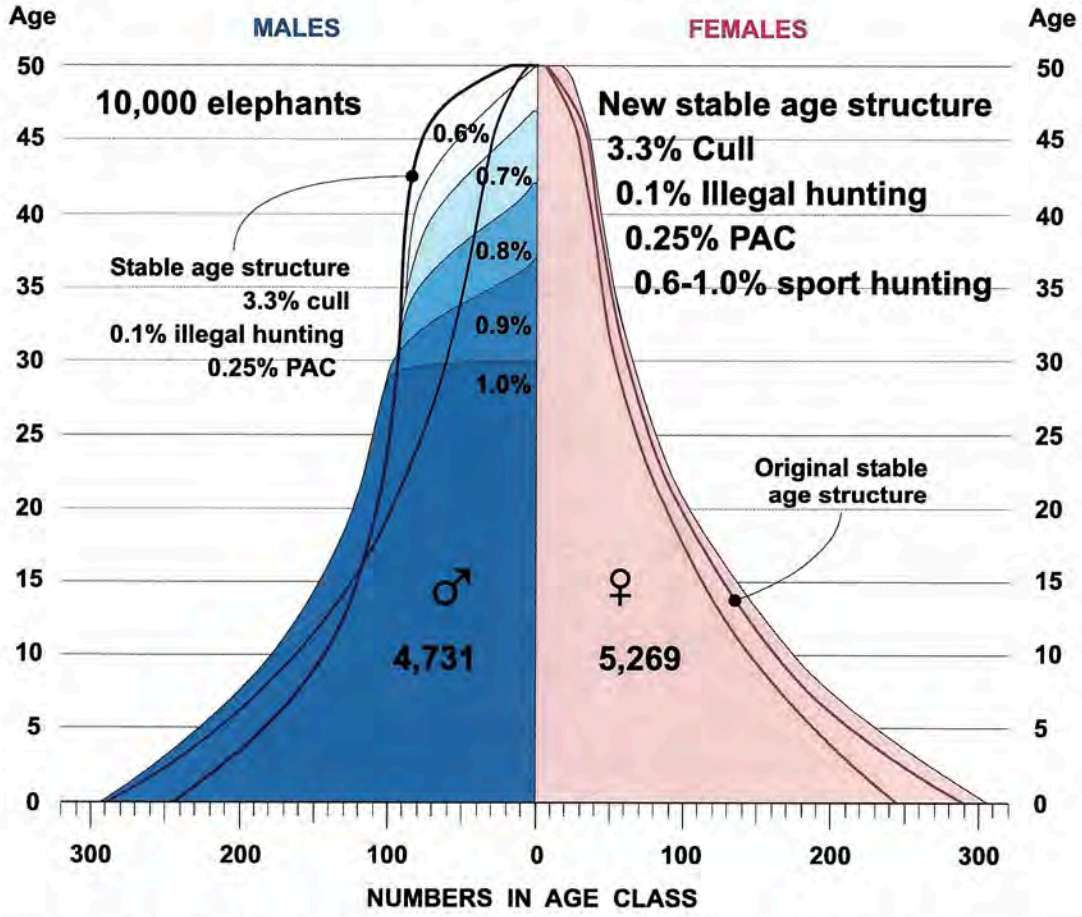

Fig.A9.5: Hunting quotas for a combined regime of culling, PAC and illegal hunting

The sustainable hunting quotas decrease significantly from those possible when there is no illegal hunting or problem animal control (**Fig.A9.4** on the previous page). If it is desired to have some males maturing beyond 40 years, the maximum sustainable quota is about 0.8% of the population.

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July 28th, 2020

Department of the Interior
U.S. Fish and Wildlife Service
Attn: Amy Brisendine
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
VIA E-MAIL: amy_brisendine@fws.gov

RE: PRT # 85343C, Applicant Bryan Ottmers, elephant from Zimbabwe
Supplement to the Import Permit Application

Ms. Brisendine:

This is a supplement to the existing application, PRT # 85343C, for Bryan Ottmers for his elephant trophy from Zimbabwe.

Answers to Missing section of Application:

6b. Date the Wildlife was taken: August 9th, 2015.

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 the attached permits.

9a. Do you have any information regarding the population status or trend data on the species hunted?

Zimbabwe's elephant population is almost 20% larger than in 1997, when it was down-listed to Appendix II of CITES and the FWS made a positive enhancement finding to allow the import of elephant trophies. (See Zimbabwe Elephant Management Fact Sheet attached for references and further information). In the Save Valley Conservancy it is reported that there are over 2,700 elephants currently that have grown from a starting population of 560. This population is expected to steadily increase for the next 30 years, due to the Elephant Management Plan that has been implemented for the Save Valley Conservancy (see attached).

9b. In-order-to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Members of the Save Valley Conservancy spend almost all trophy fees on fence maintenance, game scouts, anti-poaching, maintenance of roads, operation of pipelines and water points for wildlife, and community assistance. (See letter from Save Valley Conservancy on Trophy Hunting). It covers anywhere from 60-100% of the cost for successful wildlife conservation in the area.

Levies are also paid to the Conservancy to provide staff to monitor programs that allow central management of wildlife and quota setting, recognizing that wildlife living on any one property are part of one larger population living within Conservancy boundaries.

An elephant collaring program was established for Save Valley Conservancy in 2018 and a report on the findings is included.

9c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please reference the Operator Enhancement Report provided by Zambezi Hunters – please see the e-mail attached stating that Crane Safaris has since taken over operating in Sango- therefore no previous financial data was available for the 2017 and 2018 years for Zambezi that were on record.

Please refer to these documents and the hundreds of pages of information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by the government authorities in Zimbabwe., outfitters, and others, in making a positive enhancement finding and issuing an import permit for this elephant trophy.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,

Aimee Korver
Permits Paralegal Conservation Force

Cc: Mr. Bryan Ottmers w/attachments

Enclosures:
a. Hunting Permits
b. Zimbabwe Elephant Management – Fact Sheet
c. Save Valley Conservancy Letter on Trophy Hunting
d. Save Valley Conservancy Elephant Collaring
e. Operator Enhancement Report
f. Save Valley Conservancy Management of the Elephant Population

APPLICANT:

BRYAN OTTMERS

ZIMBABWE

ELEPHANT MANAGEMENT

FACT SHEET

SHORT FACT SHEET—ZIMBABWE ELEPHANT MANAGEMENT (updated May 2018)

- Zimbabwe maintains the second-largest elephant population in the world, which has grown from under 5,000 in 1900 to over 83,000 today. It is larger than the elephant populations of West and Central Africa combined. It is almost the same size as the populations of all of Eastern Africa.

Region / Country	Estimated Elephant Population (2016 Report)[1]
West Africa	11,489
Central Africa	24,119
Southern Africa - Zimbabwe alone -	293,447 - 82,630 -
Eastern Africa	86,373

- Zimbabwe's elephant population is almost 20% larger than in 1997, when it was downlisted to Appendix II of the Convention on International Trade in Endangered Species (CITES) and the FWS first made a positive enhancement finding to allow the import of elephant trophies.[2] Zimbabwe's elephant population is stable over the last 15 years, despite rapid growth of the country's human population, which increased by 24.33% between 2000 and 2016.[3]

- Hunting offtakes are a fraction of a percent and have no biological impact on the overall elephant population (i.e., do not cause population declines). Average annual offtakes between 2010-2013 were 0.276% of the total population. Moreover, hunters target older bull elephant that have already reproduced and spread their genes. Removal of older bulls tends to increase population growth rates.[4]

- Zimbabwe's wildlife authority, the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), is a "parastatal." It is separate and largely funded separately from the Central

[1] Within a 95% confidence limit, without the plus/minus interval, and without "Informed Guesses." IUCN African Elephant Specialist Group, African Elephant Status Report (2016), https://www.iucn.org/ssc-groups/mammals/african-elephant-specialist-group.

[2] This annotation is for "the exclusive purposes of allowing ... trade in hunting trophies," among other things. Zimbabwe's elephant population has grown from 66,000 to approximately 83,000. See Zimbabwe's downlisting proposal, https://www.cites.org/sites/default/files/eng/cop/10/prop/E-CoP10-P-27.pdf.

[3] Zimbabwe's population has grown from 12.22 million in 2000 to 16.15 million in 2016. World Bank, https://data.worldbank.org/country/zimbabwe?view=chart.

[4] ZPWMA (April 2014, July 2015); R.B Martin, Background Study (Apr. 2005).

government. ZPWMA was not disrupted by the 2017 Presidential transition. President Mnangagwa has confirmed that ZPWMA is proceeding with "business as usual."[5]

- Hunting areas in Zimbabwe are over three times the size of the national parks. The elephant habitat includes approximately 27,000 km^2 in National Parks, 18,900 km^2 in Safari Areas, over 50,000 km^2 in Communal (CAMPFIRE) Areas, and 7,000 km^2 in private conservancies.[6] Communal (CAMPFIRE) Areas (90%) and private conservancies are almost wholly funded by hunting revenues, which justify the dedication of this space to nature in place of alternative uses like livestock.

- Hunting fees make up a significant portion of ZPWMA's revenues. Trophy and concession fees generated almost $5.1 million for ZPWMA in 2014. Over half of these fees were paid by U.S. clients. Approximately 80% of ZPWMA's revenues are allocated for law enforcement. Put simply, hunting revenues from U.S. hunters pay for most of the anti-poaching across Zimbabwe's elephant range. And the FWS suspension of elephant trophy imports reduced ZPWMA's revenues by almost 14% in 2014 compared to 2013. The suspension has reduced the revenues available for ZPWMA (as well as CAMPFIRE communities and individual operators) to combat poaching.[7]

- Poaching in Zimbabwe has generally been kept under control so as not to have a national effect. Hunting operators support this successful control of poaching by funding their own patrol teams, paying salaries for community scouts, and assisting ZPWMA with equipment, rations, petrol, and other needs. Hunting operators are the first line of defense against poaching. For example, a sample of 15 operators spent approximately $1.32 million in 2015 to protect an area exceeding 28,000 km^2.[8] One operator, Charlton McCallum Safaris in the Dande/ Mbire areas, spends an average of $85,000/year on anti-poaching. From 2010 to 2016, their efforts led to an 80% decline in elephant poaching in an important border region.[9]

---

[5] ZPWMA Website, http://zimparks.org/about-zimparks/; see also news reports of the transition in Zimbabwe, e.g., http://www.thezimbabwemail.com/main/mnangagwa-swears-new-cabinet/; https://citizen.co.za/news/news-africa/1746240/mnangagwa-names-new-zimbabwean-cabinet/.

[6] UN Protected Planet, https://protectedplanet.net; CAMPFIRE Association of Zimbabwe Press Statement (November 2017), http://campfirezimbabwe.org/index.php/news-spotlight/26-press-stateme...1. Elephant habitat in Zimbabwe also includes over 10,000 km^2 in Forest Areas managed by the parastatal Forestry Commission.

[7] Note that hunting and concession fees are considerably higher than this, but because of the grant of "appropriate authority," hunting fees accrue to the landholder on communal and private land, not to ZPWMA. "Appropriate authority" incentivizes landholders to maintain and increase wildlife populations because they retain the benefits of the sustainable use. ZPWMA (April 2014, July 2015).

[8] ZPWMA (October 2016).

[9] Dande Anti-Poaching Unit Website, http://dapuzim.com/.

- Regulated hunting also reduces poaching by incentivizing greater tolerance among the rural communities who live side-by-side with dangerous game species. Hunting provides most of the revenue in CAMPFIRE Areas and averaged $2.2 million/year prior to the FWS suspension of elephant trophy imports. Elephant hunting alone generated approximately $1.6 million per year (65-70% of the total on average). Most elephant are hunted in CAMPFIRE Areas (55 compared 49 in government areas in 2014).[10]

- Revenues from regulated hunting are invested in game monitoring and community projects such as boreholes, classrooms and clinics, food purchases, and other livelihood improvements for Zimbabwe's rural poor. Approximately 200,000 families directly and another 600,000 indirectly benefit from CAMPFIRE revenues. Because of these benefits, poaching and problem animal control are low in CAMPFIRE Areas. This tolerance exists even though elephant destroyed over 7,000 hectares of crops and claimed the lives of approximately 50 people in CAMPFIRE communities between 2010 and 2015.[11]

- There is no evidence that ivory poaching—in Zimbabwe or anywhere else—is tied to terrorism, and that claim has been debunked by credible research, although it is often repeated in popular media.[12] In any event, regulated hunting reduces the poaching: in the Southern African countries that depend upon regulated hunting as a conservation tool (including Zimbabwe), poaching levels are the lowest in Africa. According to CITES' Monitoring the Illegal Killing of Elephants (MIKE) data, Southern African countries have the lowest Proportion of Illegally Killed Elephant (PIKE). PIKE is used to assess whether poaching levels are unsustainable. It has never risen above the sustainability threshold in Southern Africa, even in 2011, when the recent poaching crisis was at its highest level. PIKE has declined in Zimbabwe's MIKE sites since 2011.[13]

- Zimbabwe's National Elephant Management Plan (2015-2020) is the most up-to-date plan in Africa. Responding to the FWS' concerns, this new plan identifies specific action items, outputs, and Key Performance Indicators to measure the success of plan implementation. The national plan is supplemented by four regional action plans with the same framework to address the unique challenges of each range.

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[10] ZPWMA (July 2015).

[11] CAMPFIRE Association Press Statement, http://campfirezimbabwe.org/index.php/news-spotlight/26-press-stateme...1; CAMPFIRE Association (April 2014).

[12] This research is available at: https://rusi.org/sites/default/files/201509_an_illusion_of_complicity_0.pdf; see also https://www.nytimes.com/2015/10/30/opinion/the-ivory-funded-terrorism-myth.html.

[13] CITES/MIKE Website, https://www.cites.org/eng/prog/mike/data_and_reports.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD OCT 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 IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Blake	Robert	Whitney	

(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
The Woodlands	TX	77375	Harris	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country
The Woodlands	TX	77375	Harris	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 [illegible] I certify that the information submitted in this application for a permit is complete and [illegible]y false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

10/08/2018

Sig[illegible]amped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Robert Whitney Blake
   (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Loxodonto 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:

   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, Omusati Region, Uukwaluudhi Conservancy, 14°29' 24.1" E 18°01' 32.1" S, approximately 70 kilometers east of Opuwo

   b. Date wildlife was hunted:

06/14/2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Kabous Grunschloss, Jamy Traut Hunting 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]:

Kings Taxidermy
27 Bahnhof Street 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).
Namibia Permit 180128

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:	Kabous Grunschloss
Business Name:	Jamy Traut Hunting Safaris
Address:	871 Cadmium Street
City:	Tsumeb, Oshikoto Region Namibia 9000
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

9a. Do you have any information regarding the population status or trend data on the species hunted?

According to the Namibian Ministry of Environment and Tourism game census, the elephant population North of Etosha National Park is stable to increasing.

Etosha National Park estimated elephant population 2911 (September 2015)

Northwestern Namibia (excluding Etosha National Park) estimated elephant population 1716 (October 2016)

9b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

I paid Jamy Traut Hunting Safaris $24,000 in trophy fees for direct benefit to the Uukwaluuhdi Conservancy with oversight from the Namibian Ministry of Environment and Tourism.

This elephant hunt was led by two officers from the Namibian Ministry of Environment and Tourism, Ranger Michael Mumbalu and Assistant Ranger Gabriel Nuunyango. These officers accompanied myself, Professional Hunter Kabous Grunschloss and the Uukwaluudhi Conservancy Game Scout to inspect numerous village farm plots raided by three bull elephants on a nightly basis. We tracked these specific bulls, taking the largest and oldest of the three.

Trophy fees benefit the Uukwaluudhi Conservancy as follows:

- Compensation to farmers for crop losses and elephant damage to fences and water tanks
- Salaries of game scouts and anti-poaching personnel
- Conservancy management staff salaries

9c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species hunted?

Jamy Traut Hunting Safaris directly assists Namibian Ministry and Conservancy officials with anti-poaching patrols.

Each hunting camp utilized by Jamy Traut Hunting Safaris employs approximately 25 to 30 local people (chefs, cleaners, skinners, trackers).

Jamy Traut Hunting Safaris has purchased solar panels and electrical submersible pumps for use by the conservancies. Wild game activity was clearly evident at these wells.

Jamy Traut Hunting Safaris is actively involved in management of human-wildlife conflict with elephants.

Jamy Traut Safaris is also working with the Africat Foundation in northwest Namibia to monitor leopard and lion populations. Assistance includes providing trail cameras as well as sharing observations and photos documented during safari and scouting operations.

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 e(b) (6) opard trophy, I understand that I may only import two leo

Applicant's signature: [redacted] ate: 10/08/18

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).

Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

VALID FROM:		06.06.18
VALID TO:		21.06.18
RECEIPT No.:		5753339

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: R. Blake

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common		Springbok		Other	
Buffalo		Klipspringer		Steenbok		* Please report back within 48hrs after hunt	
Crocodile		Kudu		Warthog			
Dik-Dik		Lechwe		Waterbuck			
Eland		Oryx (Gemsbok)		Wildebeest, Black			
Elephant	1X	Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck		Zebra Burchell's			
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: Uukwaluudhi Conservancy

Guided by (name of guides): K. Gronschloss

(b) (7)(C)

[redacted]

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 Name	Farm No	Signatures: Farm owner	Signatures: Hunter	Signatures: Professional hunter / Master hunting guide / Hunting guide
14/10	Elephant							45	M	Okonjati		[redacted]	[redacted] (9) (b)	

*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.

RCVD OCT 23 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Andress	Ronnie	Lee	

(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) Room #; no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Katy	Texas	77450	Harris	United States

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the oth***of Title 50***, and I certify that the information submitted in this application for a permit is complete and ac***erstand*** that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 09/28/2018

Signature of ***ocopied*** or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Well Worldwide Energy Logistics, Inc.
   17401 Aldine Westfield Rd. Houston, Texas 77073 c/o Lynette Lilley281-606-2400 xt 2402

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Lynette Lilley 281-606-2400x2402
   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- Elephamtidae

   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:

   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, Capriv Strip, Baninu and Kasika, Katima Mulilo

   b. Date wildlife was hunted:

August 30,2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

JN Blaauw

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 Taxidermy
PO Box 11908, Plot 43 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).
INCLUDED

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:	JN Blaauw	ph BUSINESS ADDRESS
Business Name:	c/o Reisner Taxidermy	JN Blaauw
Address:	PO Box 11908, Plot 43 Brakwater	PO Box 1677 Academia
City:	Windoek	WHK
State/Province:	Namibia	Tel: 264-811464959
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 Namibian government(Games Department) has a cities approved game management plan for 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?

The government fee was a 1% of the Total price. The Trophy was 65% which all go to the Kasika Community Eastern Capri. IThe rest of the 34% is going to the outfitter which is used for running cost (includes 18 people of Kasika Community that are employed by us) the rest is profit.

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 Sponsor US $10 000 every year to the community as they will use that for any of there activities. also the outfitter is currently busy to install 2 waterholes.

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: 09/28/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from the list of designated ports. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		182398
VALID FROM:		23.08.18
VALID TO:		05.09.18
RECEIPT No.:		5m184

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: R.L. Andrews

Residential Address:

Country: USA

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok	/	Impala Common		Springbok	/	Other	
Buffalo Cape	1X	Klipspringer		Steenbok	/	*Royal Antelope Hippotragus equinus	1 Female
*Crocodile Nile	1X	Kudu		Warthog Common	1X	*Natural Animal born in captivity Protected by Law of Namibia	
Dik-Dik	/	Lechwe		Waterbuck		Only the licensed concession	
Eland	/	Oryx (Gemsbok)		Wildebeest, Black			
*Elephant - Bull Ivory	1X	Ostrich		Wildebeest, Blue			
Giraffe	/	Reedbuck		Zebra Burchell's			
Grey Duiker Common	1X	Rhinoceros, Black		Zebra Hartmann's			
Hartebeest	/	Rhinoceros, White		Cheetah			
*Hippopotamus Bull	1X	Roan		Leopard			
Impala Black-Faced	/	Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: Bamunu + Kasika Conservancy

Guided by (name of guides): JN. Blaauw

R.A. Andrews

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way and is not transferable.

prime press 042018

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

RCVD OCT [illegible]

4

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Bezzina	Lance	A	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Dubuque	IA	52003	Dubuque	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best [illegible] understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

10/22/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Lance Bezzina (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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:

Republic of South Africa, Klaserie Private Nature Reserve Limpopo province near Hoedspruit city

b. Date wildlife was hunted:

Sept 2, 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Magnum Hunting Safaris
Wulf Schwerdtfeger

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]:

THABA MAHAKA TAXIDERMY
32 ROODEPOORT PLOTS, POLOKWANE, LIMPOPO, 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). INCLUDED / see attached
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	THABA MAHAKA TAXIDERMY
Address:	32 ROODEPOORT PLOTS
City:	POLOKWANE
State/Province:	LIMPOPO
Country, Postal Code:	SOUTH AFRICA

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?
See attached

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
See attached

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
see attached

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client'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: 10/22/2018

Be aware that there may be addition[redacted]l 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 № 222619 (222619)

- [x] EXPORT
- [ ] RE-EXPORT
- [ ] IMPORT
- [ ] OTHER

ORIGINAL

2. Valid until: 2019/03/08

3. Importer (name and address)

BEZZINA LANCE ANTHONY
(b) (6)
DUBUQUE, IOWA
52003 UNITED STATES OF AMERICA

3a. Country of import: ~~UNITED STATES OF AMERICA~~ UNITED STATES OF AMERICA

4. Exporter / Re-exporter (name, address and country)

THABA MAHAKA TAXIDERMY
32 ROODEPOORT PLOTS
POLOKWANE
LIMPOPO SOUTH AFRICA

5. Special conditions

PERMIT IS INVALID WITHOUT ANNEX A
TUSK #S: ZA/17/2659/17.40 MP & ZA/17/2658/18.38 MP
ADDENDUM SECURITY STAMP:1665677

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): H

5b. Security stamp No: 1665670

	7.a 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.a AFRICAN ELEPHANT *loxodonta africana*	9. TUSK[TUS]	10. I W	11. 1 ONE	11a. 70/300/2018
	12. Country of origin* ZA / Permit No / Date / 12a. Country of last re-export / Certificate No / Date			12b. No. of the operation ** or date of acquisition ***	
B	7.a AFRICAN ELEPHANT *loxodonta africana*	9. TUSK[TUS]	10. I W	11. 1 ONE	11a. 71/300/2018
	12. Country of origin* ZA / Permit No / Date / 12a. Country of last re-export / Certificate No / Date			12b. No. of the operation ** or date of acquisition ***	
C	7.a AFRICAN ELEPHANT *loxodonta africana*	9. TROPHY[TRO]	10. I W	11. 1 ONE	11a.
	12. Country of origin* ZA / Permit No. / Date / 12a. Country of last re-export / Certificate No / Date			12b. No. of the operation ** or date of acquisition ***	
D	7.a NIL *nil*	9.	10.	11. 0	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:

VAN WETTEN AA

POLOKWANE — 2018/09/06 — Security stamp, signature and official seal

14. EXPORT ENDORSEMENT

Block	Quantity
A	
B	
C	
D	

15. Bill of Lading/Air Waybill Number:

Port of Export — Date — Signature — Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2482 (2821)

In answer to question 9 a, b and c:

a. The population status of the elephants in the Klaserie and greater Kruger park has increased since implementation of conservation and hunting. The hunting with trophy fees has provided funds for "the elephant project" as below that as you can see from the objectives not only monitors the sheer number of elephants it also monitors their impact on the environment, movements and co-existence with man.

b. The trophy fee was $38,500 and daily rate of $500/day. These fees provide monies to not only "the elephant project" but also "The Ground Hornbill Project" and Rhino anti-poaching activities (see below).

c. There are three conservation projects going on in the Klaserie Private Nature Reserve and the information is below. My hunting dollars from answer "b" (above) went to pay for this.

The Klaserie Private Nature Reserve (KPNR) is one of the largest privately-owned nature reserves in South Africa covering some 60,000 hectares and is part of the greater Kruger National Park. It is an entirely non-government organization involved in the full spectrum of Nature Conservation.

The KPNR was established in 1969 and was officially proclaimed a nature reserve in 1972 with Jan de Necker as the founding chairman and Van Reenen Van Vuuren as the first warden. The reserve is run by an executive committee comprising members or landowners who are elected at the AGM and operate through the reserve's warden Colin Rowles. Colin circulates a monthly report to all the members keeping them informed of the weather, the condition and status of the fauna and flora and any other matter of general interest.

The KPNR is a member of the Association of Private Nature Reserves (APNR), a cooperative organization established to coordinate the interests of its members and to act as a single body in interacting with government entities. The association comprises Klaserie, Timbavati, Umbabat and the Balule.

We are deeply committed to the non-profit organization Eco Children (formerly Children's Eco Children) which is in an initiative of the Klaserie Private Nature Reserve. Eco Children has been very successful in interacting with the children of the local community from a hands-on conservation education perspective and through a 'whole school development' approach. Eco Children has a specific focus on the environment and on education, and the significance and importance of both to our lives and the future of our country.

We host The Ground Hornbill Project which is sponsored by The Fitzpatrick Institute of African Ornithology and directed by Professor Phil Hockey. There are two other research projects within the APNR. The elephant research project operating under the umbrella of "Save the Elephants" founded by Dr Ian Douglas Hamilton and the "Tembo" project currently studying buffalo. This is one of the projects hosted by the Resource Ecology group of the University of Wageningen in the Netherlands.

There are various commercial operations within the KPNR ranging from rustic bush camps and walking trails to luxury game lodges. It is the Reserves policy to keep the commercial and thus human impact to a minimum as it is the mission to make the KPNR as near a pristine environment as possible.

The Elephant Project

Research commenced in 2003 as Save the Elephants – South Africa, and draws on data collected over almost two decades. The research contributes towards the long-term survival of the African elephant, thereby maintaining the vital diversity of our world. If elephants are to survive, we need scientific knowledge and an intimate understanding of their movements and needs.

Our quest involves delivering research solutions which acknowledge elephants as an integral part of the ecosystem they occupy. We work towards achieving a greater understanding of the complex relationships that elephants have with each other and their surroundings, including the people with whom they share their world.

SCIENTIFIC OBJECTIVES

1. To conduct research into how habitat resources, the need for safety and the social presence of other elephants influence observed patterns in elephant movements.

2. To understand the abundance, movements and conservation importance of the remaining large tusked bulls within the Great Limpopo Transfrontier Park (GLTP) and to use these flagship individuals as educational tools to address broader conservation concerns.

3. Relate elephant occurrence to their effects on the vegetation and infrastructure where elephants and man co-exist.

4. To determine the level of sensitivity between selected tree-nesting birds and the impact of elephant on trees used as nesting sites. (See the Ground Hornbill Project below.)

5. To assess the efficacy of experimental mitigation methods aimed at reducing the effects of elephants in localized areas.

6. To further our understanding of how elephant mortality rates differ between South Africa and other African range-use states in view of the escalating illegal trade in ivory.

Methods

Our overall research program within GLTP represents a long-term study focused on understanding what motivates elephant movements from core conservation areas such as the Kruger National Park (KNP) into peripheral Protected Areas along its western, eastern and northern borders.

OBJECTIVE 1

We track elephant movements using advanced GPS and GMS technology in order to understand their habitat use. By identifying specific elephants, we study population dynamics and objectives relating to the drivers of elephant movements.

OBJECTIVE 1&2

We identify, track and monitor large-tusked and potentially large-tusked individuals to record their movements and fitness, in terms of annual musth cycles. In doing so, we are offering them a measure of protection. We have deployed a number of collars on large-tusked bulls, some of which have gained public support and recognition.

OBJECTIVE 3&4

We provide information on the effects of elephants as drivers of ecosystem change in relation to indicator species such as large trees (primary) and selected tree nesting birds (secondary). Individual trees are monitored over time to establish rates of change in important landscape features.

OBJECTIVE 5

We experiment with methods of alleviating the impact that elephants have on trees by wire-netting large trees or using beehives as natural deterrents, thus increasing food security for other species including humans. This information contributes towards improving our knowledge of the ecological processes that promote the sustainable coexistence of elephants, their habitats and people.

OBJECTIVE 6

We monitor and compare elephant mortality rates and causes thereof within the continental context. The southern states (Botswana, Namibia, South Africa and Zimbabwe) have become the last stronghold for the African elephant due to uncontrolled poaching to the north of these borders.

We initiate research projects as well as collaborate with established research sites across the southern states to deepen our understanding on how different land-use practices influence the movements, survival and the conservation significance of elephants.

Research Activities (4):

1. Identify

IDENTIFYING INDIVIDUAL ELEPHANTS IN ORDER TO STUDY POPULATION DYNAMICS

Western Kruger National Park (APNR)

Since 1996: An extensive individual elephant ID database of 1500+ elephants.

Northern Kruger NP (Makuleke Concession)

Since 2008: An ID database of 100+ bulls and the identikits of 11 independent breeding herds

2. Track

TRACKING ELEPHANTS USING ADVANCED TECHNOLOGY (GPS-SATELLITE AND GPS/GMS COLLARS) TO UNDERSTAND HABITAT USE

Western Kruger National Park

Since 1998: 62 collaring operations including 17 re-collaring's.

We currently have distribution data spanning 10 years from 8 herds and 29 bulls (ranging in age from 12 to 50 years).

Eastern Kruger National Park

December 2006: 7 GPS-satellite collars fitted on elephant bulls.

The focus is to gain a better understanding of elephant movements, their routes and under what environmental conditions they move into the new Limpopo NP in Mozambique. A secondary aim is corroborate or refute the results of our research efforts to the west of KNP.

Northern Kruger National Park (Makuleke Concession)

October 2008: 12 GPS-satellite collars fitted on elephants (6 bulls, 6 cows).

2012: 9 of these elephants were re-collared

This project is in collaboration with the Kruger National Park, the Makuleke Community and The Wilderness Safari Trust.

3. Monitor

MONITORING INDIVIDUAL TREES OVER TIME TO ESTABLISH RATES OF CHANGE IN IMPORTANT LANDSCAPE FEATURES

In 2004 we initiated an individual tree monitoring program. We are currently surveying 2971 individually labelled trees to determine their survival rate and the influences of accumulative elephant impact, wind toppling, insect attack or the effects of fire.

On an annual basis, we monitor 62 large trees used by southern ground hornbills as nesting sites to understand the influence of elephant impact on these sites.

We monitor 226 trees used by raptors and white back vultures as nesting sites to understand the influence of elephant impact on these sites.

4. Experiment

EXPERIMENT WITH VARIOUS METHODS OF ALLEVIATING ELEPHANT TREE IMPACT AND PROVIDE SCIENTIFIC KNOWLEDGE TO ALL STAKEHOLDERS.

Testing the efficacy of wire netting large trees in order to protect them and to foster positive human-elephant interactions, as large trees are considered to be of ecological and aesthetic importance to landowners.

Establishing an experimental site where bees will be used as a deterrent for elephant impact, thereby providing food security for other species, including humans.

The Southern Ground-Hornbill Project

The Southern Ground-Hornbill *Bucorvus leadbeateri* is a conservation icon of South African savannas. During the 20th Century its range and population size in South Africa decreased by some two thirds, with the birds disappearing from much of their historical range. Such a rapid decrease in the population of a long-lived, slow-breeding animal is of great conservation concern and, based on IUCN (International Union for Conservation of Nature) criteria, the official conservation status of Southern Ground-Hornbills in Southern Africa has been elevated from Vulnerable to Endangered.

The reasons for their decline are mainly habitat loss and persecution. Poisoning is also a concern since Ground-Hornbills are carnivorous they are sometimes the unintentional victim of poisoning by consuming carcasses laced with poisoning aimed at killing off livestock predators such as leopard and jackal. Because of the Ground-Hornbills' complex social structure and slow breeding rate, self-reintroduction would, at best, be very slow. This means that reintroduction programs are probably imperative to improve the species' precarious conservation status.

Various organizations are working together now to ensure the long-term survival of this species in the wild. Together we form the Ground Hornbill Action Group and meet at various times in the year to discuss our findings, achievements and future plans. Organizations such as the Percy Fitzpatrick Institute of African Ornithology, Mabula Ground-Hornbill Project, Endangered Wildlife Trust's Large Birds of Prey Working Group, Johannesburg Zoo, Pretoria's National Zoo, Mpumalanga Parks and Tourism, and others put together a Recovery Plan for the species to guide all involved and to lay out goals and objectives for the coming years.

SNAPSHOT OF SOUTHERN GROUND-HORNBILLS IN SOUTHERN AFRICA

- There are approximately 3000 birds left in the wild in southern Africa
- Their distribution extends from as far south as the Eastern Cape in SA all the way up to Kenya
- In South Africa the total number is estimated to be around 1500 birds, most of them occurring here in Kruger National Park as well as the Limpopo River Valley
- Groups comprise an alpha pair as well as numerous male sub-adult helpers. It is not yet fully understood where females go when they leave the group at a young age
- They nest in large cavities in trees, occasionally in cliffs
- They are very competent fliers but they fly low at canopy height
- They are strict carnivores eating snakes, lizards, insects, tortoises, birds
- Their closest relative is the Abyssinian or Northern Ground-Hornbill *Bucorvus abyssinicus*

HISTORY OF THE PROJECT IN THE APNR (ASSOCIATED PRIVATE NATURE RESERVE)

The Institute started monitoring groups of ground-hornbills in the APNR in 2000, and erected some 30 artificial nests in 2002 and 2003. The original rationale for this study was an exploration of social behavior in the world's largest cooperatively breeding bird.

The Fitztitute's Southern Ground-Hornbill Research Program aims to gain a scientific understanding of the environmental conditions which promote the survival and successful reproduction of these birds.

We will use this knowledge to:

• Gain a scientific understanding of the environmental conditions that promote the survival and successful reproduction of Southern Grounds-Hornbills.

• Provide the scientific information to guide reintroduction programs such that their efficiency and efficacy are optimized.

PROJECT RATIONALE

In many cases, however, the drivers of local extinctions are known, and in some instances these are no longer operative. Because of the groundhornbills' complex social structure, self-reintroduction would, at best, be very slow. This means that reintroduction programs need to be considered in an attempt to improve the species' precarious conservation status. Given this set of circumstances, the Southern Ground-Hornbill Research and Conservation Program has the following overarching aims:

To gain a scientific understanding of the environmental conditions that promote the survival and successful reproduction of Southern Ground-Hornbills.

To use this knowledge to identify areas previously occupied by ground-hornbills that are now suitable for their reintroduction.

To provide the scientific information to guide reintroduction programs such that their efficiency and efficacy are optimized.

KEY RESULTS

The Percy FitzPatrick Institute has been monitoring group distribution, composition and breeding performance of ground-hornbills at the APNR since the breeding season of 2001/2002. We now have reproductive data spanning nine breeding seasons. In 2009/2010, MSc student Gwyneth Wilson analyzed the first eight years of data from this long-term monitoring to determine the factors influencing differences in reproductive performance between groups. There were major differences in reproductive success amongst the 23 ground-hornbill groups monitored within the APNR. Over the period 2001-2008 there were some highly successful groups that bred and fledged a chick almost every year, whereas other groups either did not breed or did not rear a single chick over the same period. During 2001–2008 (184 possible group breeding years) there were a total of 67 breeding attempts by 17 of the 23 groups.

RHINO PROTECTION

The Klaserie Private Nature Reserve is as vulnerable to Rhino Poaching as are all SA's parks.

Hunting dollars along with other donations and revenue have allowed the following:

- The Establishment of a dedicated anti-poaching rhino unit
- Accommodating the new anti-poaching unit in a separate newly established camp designed specifically for these operations
- Employment of a new team of field rangers dedicated to rhino poaching
- The specialized training of the new field rangers in anti-poaching techniques
- The equipping of the new field rangers team with gear, munitions and communication equipment
- The acquisition of a new 4x4 vehicle for the anti-poaching team
- The acquisition of a specially trained tracker dog - Koevoet
- Community awareness projects both within and outside the Klaserie through Childrens' EcoTraining
- The establishment of motion sensor programs
- Klaserie intelligence sharing and co-operation with adjoining Reserves including Kruger National Park
- The establishment of reward programs in exchange for information leading to the apprehension of poachers
- Klaserie participating as an active participant in Game Reserves United (GRU) coordinating anti-poaching efforts amongst all Game Reserves forming part of the Greater Kruger National Park

- The establishment of new and technologically improved fences along our boundaries
- Increased surveillance within the reserve and along its boundaries with using cellular and camera technology
- Participating in fund raising projects to raise money for anti-poaching initiatives
- The establishment of a separate "Klaserie Private Nature Reserve Save the Rhino Fund" which is audited annually
- SARS approval for donations to and by this new fund to be income exempt and
- Increasing public awareness of the plight of Rhinos in the electronic and print media through the Klaserie Chronicle published by Childrens EcoTraining

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

LB

RCVD NOV 01 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Cabela	Daniel	Martin	

(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Dripping Springs	Texas	78620	Hays	USA

(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Dripping Springs	Texas	78620	Hays	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 (b) (6) [redacted] and I certify that the information submitted in this application for a permit is complete and t any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

10/17/2018

S r stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Daniel Cabela
(b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   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: N/A

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   Bwabwata West National Park
   Caprivi, S 18 09° C 162 E 021 42° C 495
   Nearest City: Rundu (bigger town) Divundu (very small)

   b. Date wildlife was hunted:

   1 August 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
Hunting Outfitter: HuntaFrica Namibia
Professional Hunter: J.H. Pienaar

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:
Trophaendiens LC cc
Po Box 21068, Windhoek
Namibia, 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). 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: JH Pienaar (Jakobus Hugo) +264 81 124 3299
Business Name:
Address: Farm Hester 407 / P.O. Box 1100 Gobabis
City: Gobabis, Omaheke
State/Province:
Country, Postal Code: Namibia 9000

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Please see attached

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Please see attached

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Please see attached

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to resul[redacted]o import an elephant trophy, I understand that I may import no more[redacted]ar.

    Applicant's signa[redacted] Date: 10-17-18

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Answers for Question 8 and 9 a-c

8. Person / Business shipping your trophies:
Louw Nel
PO Box 21068
Windhoek
Namibia
+264 61 232 236
+264 61 220 862
www.trophaendienste.com

TROPHÄENDIENSTE
TAXIDERMY

9. a.) The population is growing; you will see herds of up to 500 at a time, Elephants are resident in this area, with a game count in Oct 2017 of more than 2000 elephants counted. (Namibia population 26,000)

9.b) 40% of trophy fees go to the government – Game Products Trust Fund, the funds are used for repairs, maintenance, salaries for government rangers on areas where elephants roam.
Another 40% go to the community, the communities use the funds to pay game guards and also for the upliftment of the KWE people.

9.c) Outfitters have informers that we pay to do anti-poaching.
PH is a trustee on HUAP Trust (Hunters united against poaching)

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		181463
VALID FROM:		26.07.18
VALID TO:		23.08.18
RECEIPT No.:		575148

PERMIT TO HUNT FOR TROPHIES S462

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter: D.M. Cabela

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common	1X	Springbok		Other	
Buffalo	1X	Klipspringer		Steenbok		*Report within 48hours after hunt	
Crocodile		Kudu		Warthog	1X	*Advert must be in accordance with Reg 106 no 3556 1977 of Nature Con ord 4 of 1975 as amended	
Dik-Dik		Lechwe		Waterbuck			
Eland		Oryx (Gemsbok)		Wildebeest, Black			
*Elephant	1X	Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck	1X	Zebra Burchell's			
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: Brakbrata West

Guided by (name of guides): J.H. Pienaar (Snr)

(b) (7)(C) [redacted]

IMPORTANT

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
1-8-2018	ELEPHANT												[redacted] (g)	
				REPORT BACK TO REUELDA 2-8-2018										

*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.

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 04565

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant: D. M Cabela

2. Identity No. / Passport No.: USA

3. Residential address:

Tel No.: 68

4. Postal address: P.O. Box 21088 Windhoek

[redacted] (g) (g)

SIGNATURE OF APPLICANT

5. From where are products obtained: Bwabwata West

6. The following documents are attached as proof of ownership:

(a) Permit no: 181463

(b)

(c)

(d)

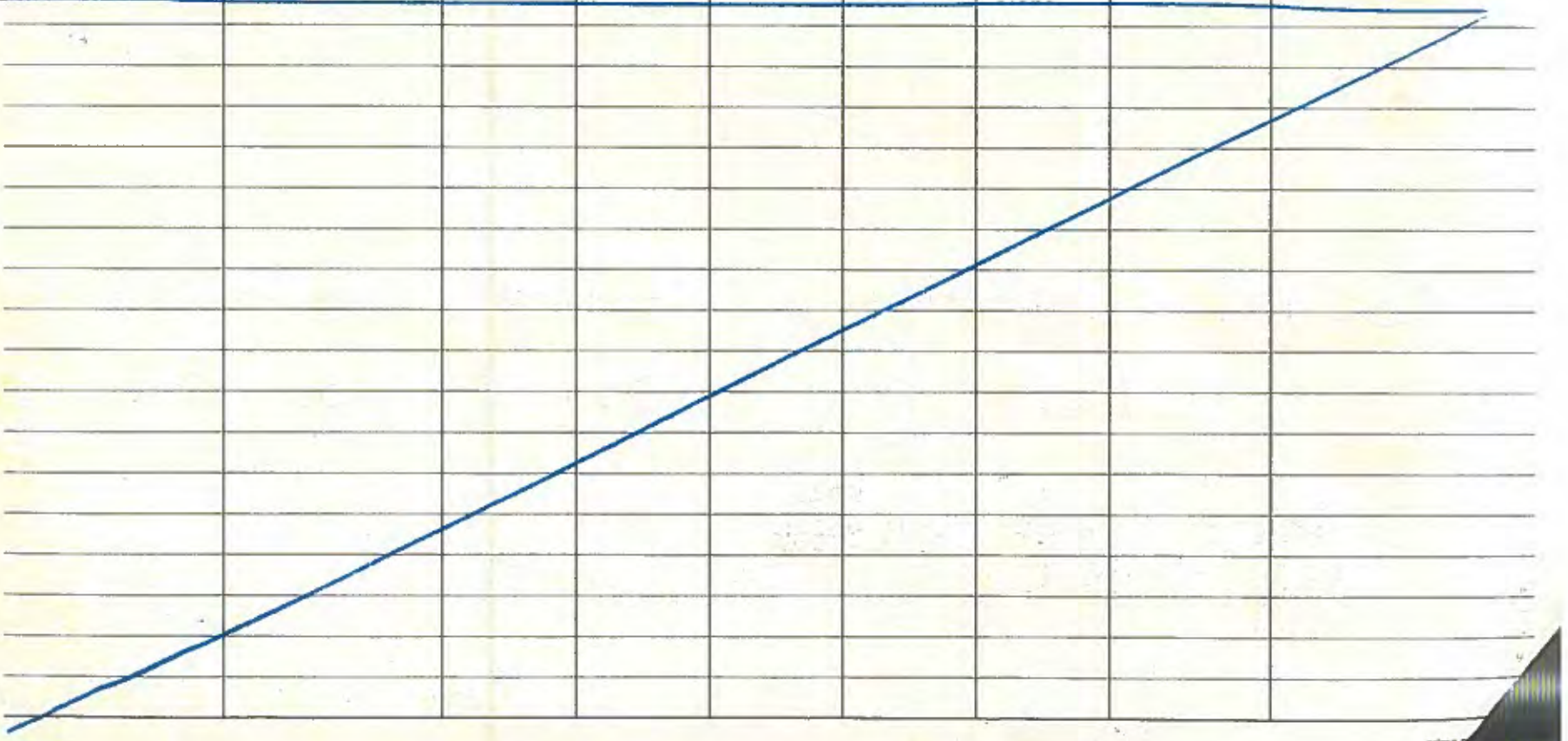
(e)

MINISTRY OF ENVIRONMENT AND TOURISM
RUNDU
2018 -09- 26
PRIVATE BAG 2080
RUNDU
REPUBLIC OF NAMIBIA

26. 09. 2018

DATE

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
Elephant	Tusk R	130	151	44	44	57	23.84	
	Tusk L	122	141	43	44	55	20.34	
	Feet x4							
	Ears x 2							
	Pannels x 6							
	Tail x 1							



Republic of Namibia

MINISTRY OF AGRICULTURE, WATER AND FORESTRY

5c

Telephone: +264-61-61-276 592
Fax +264-61-303 151

DIRECTORATE OF VETERINARY SERVICES
Private Bag 12022
Windhoek
NAMIBIA

Permit no: TR38/2018

Date of issue: **18 SEPTEMBER 2018** Expiry Date: **18 DECEMBER 2018**

VETERINARY PERMIT FOR HIDES/ SKINS/TROPHIES INFECTIOUS THINGS FROM ANIMALS SUSCEPTIBLE TO FOOT AND MOUTH DISEASE ORIGINATING FROM AREAS NORTH OF THE VETERINARY CORDON FENCE
(Issued in terms of the Animal Act, no.1 for 2011)

Authority is hereby granted to
Name: **LOUW NEL**
Address: **P. O. BOX 21068 WINDHOEK, NAMIBIA**
Telephone: **085 554 7579**

to move south of the veterinary cordon fence the following:

SPECIES	TUSKS	SKINS	SKULL	SCROTUM	EAR	FEET
ELEPHANT	6	21		3	6	12
BUFFALO		8	6	1		
HIPPO	1(SET)	3	1	1		
SABLE		4	2			
KUDU		5	4			
IMPALA		1				
WARTHOG	2(SET)		2			
LECHWE		4	2	2		

From **BABWATA CONCERVENCY , – TROPHY HUNTING KAVANGO REGION** (quarantine facility)

To **TROPHAENDIENSTE TAXIDERMY, KAPPS FARM PLOT 65/16, WINDHOEK**
(Address of approved tannery)

Subject to the following conditions:

1. The applicant accepts the sole responsibility of ensuring that the conditions below have been complied with and understands his/her duty in this regard.
2. The hides/ hides skins infectious things must be accompanied by this ORIGINAL PERMIT.
3. The hides and skins/infectious things must be loaded into previously approved airtight containers and SEALED under veterinary supervision.
4. The consignment should be presented to the State Veterinarian **RUNDU** telephone **066-255016** in sealed containers. The state veterinarian **RUNDU** must break the seals and inspect the trophies, hides& skin to verify that the products were quarantined north of the veterinary cordon fence and were subjected to one of the following treatment before granting permission to move south of the veterinary cordon fence.

5. a) Hide and skins:* wet-salted in sea salt with addition of 2% washing soda (Na_2CO_3) for at least 30 days before dispatch OR * sprayed with 5% washing soda (Na_2CO_3) followed by official quarantine for 30 days before dispatch. OR *sprayed with 5% formalin followed by official quarantine for 30 days before dispatch.

b) Trophies consisting solely of horns, bones, hooves, claws, antlers and teeth must:

(i) Be immersed in boiling water for an appropriate time so as to ensure that any matter other than horn, bone and teeth is removed; followed by official quarantine for 30 days OR

(ii) have been soaked with agitation in a formic acid solution (100 kg salt (NaCl) and 12 kg formic acid per 1000 liters of water) maintained at below pH 3.0 for at least 48 hours followed by official quarantine for at least 30 days OR

(iii) Soaked with agitation in a 4% (w/v) solution of sodium carbonate (washing soda, Na_2Co_3) maintained at pH 11.5 Or above for at least 48 hours followed by official quarantine for at least 30 days.

6. The State Veterinarian **WINDHOEK** (South of VCF) must be advised by telephone or fax of the probable arrival time of arrival at the taxidermist/tannery/quarantine facility south of the veterinary cordon fence and the seals may not be broken without permission or veterinary supervision. Trucks must immediately proceed to the approved taxidermist/tannery or quarantine by the most direct route via the main tarred road.
7. After off-loading the containers/vehicles must be disinfected to the satisfaction of the Veterinary official.
8. This permit is valid for one consignment only and cannot be used after the expiry date.

Signature .....
CHIEF VETERINARY OFFICER

Name in full .....

(5c HS 10 /12)

PLEASE NOTE – Movements are subject to compliance with Ministry of Environment and Tourism where applicable.

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No. 1018-0093
Expires 05/31/2017

RCVD JAN 11 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Berg	Verlin	Larry	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Petersburg	WV	26847	Grant	USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)
same

2.b. City	2.c. State	2.d. Zip code/Postal code.	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US80094B/9 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applic... ***of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of ... that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001

(b) (6)

Signatu... onsible 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 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:
   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: All days, Property name Mapungubwe
   b. Date wildlife was hunted: 6-23-2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): 2 - 4-feet and tail - 2 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 document]:
PLOT 114, BASHEWA P.O BOX 11526
Tigerport, Pretoria 0056 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: Rupert DEDEKIND
Business Name: Universal Trophy Services
Address: PLOT 114, BASHEWA
Address: P.O Box 11526
City: TIGERPORT, PRETORIA 0056
State/Province:
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

Applicant's signatu (b) (6) Date: 12/15/2017

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).

Catherine Cockey, Wildlife Inspector 410-694-9590
BWI Air Cargo Complex
Building F, Suite 1500 Baltimore MD 21240

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.

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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BOARD OF DIRECTORS:
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SHANE MAHONEY
RENEE SNIDER

October 25, 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Import Application of Zimbabwe Elephant Trophy for Jonathan Jones

Dear Chief Cogliano:

Enclosed please find the permit application to import an elephant trophy from Zimbabwe for Jonathan Jones. Also attached to the permit application is enhancement information provided by the Lodzi Hunters Safari Company. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zimbabwe authorities, outfitters, and others, in making an enhancement finding for Elephant trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Jonathan Jones's Elephant Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted 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 the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: Jonathan Grant Jones

Date: 10/7/2018

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity: Elephant Zimbabwe

IMPORT OF SPORT-HUNTED TROPHIES
~~(Appendix I of CITES and/or ESA)~~

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Jones	Jonathan	Grant	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Pelham	NY	10803	Westchester	USA

2.a. *Mailing Address (include if different than physical address; include name of contact person if applicable)*

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001

(b) (6) 10/7/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Grant Jones (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Loxodonta Africana - 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:

   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:

   Tsholotsho South hunting concession near the town of Tsholotsho, Zimbabwe

   b. Date wildlife was hunted: August 18, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   Lodzi Hunters (safari company); Marthinus (Tinie) Kok (professional hunter)

   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]:

   TCI (taxidermist), 4 Josiah Chinamano Rd, Belmont, Bulawayo, Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

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: TCI, 4 Josiah Chinamano Rd, Belmont, 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?

   Yes. See attached page.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   US$35,000. The concession is part of Zimbabwe's CAMPFIRE program (please see more below in 9.c.). Hunting generates about 90% of the CAMPFIRE program income, with elephant hunting contributing up to 70% of annual income. American hunters make up 60% of the clients in CAMPFIRE areas.

   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 concession is part of Zimbabwe's CAMPFIRE program, which has a combined 2.4 million beneficiaries, made up of 200,000 households that are directly involved in the program. Another 600,000 households benefit indirectly from wildlife related income. Wildlife income is used for administration, field patrols, monitoring of hunts, problem animal control, water provision, and fire management. Communities have drilled boreholes, constructed seasonal roads, erected fencing to keep out wildlife, purchased tractors, and directed drought relief food. Children benefit from the construction of schools. Communities also benefit from the donation of elephant meat.

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: 10/7/2018

    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.

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).

Jonathan Grant Jones
(b) (6)
Pelham, NY 10803
(b) (6)

Question 9.a.
Do you have any information regarding the population status or trend data on the species hunted?

Answer: The greater Hwange National Park area, which includes an unfenced border with the Tsholotsho South concession, contains an estimated 40,000 elephants. A sustainable population is 20,000.

Question 9.b.
In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

Answer: US$35,000. The concession is part of Zimbabwe's CAMPFIRE program (please see more below in 9.c.). Hunting generates about 90% of the CAMPFIRE program income, with elephant hunting contributing up to 70% of annual income. American hunters make up 60% of the clients in CAMPFIRE areas.

Question 9.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?

Answer: This concession is part of Zimbabwe's CAMPFIRE program, which has a combined 2.4 million beneficiaries, made up of 200,000 households that are directly involved in the program. Another 600,000 households benefit indirectly from wildlife related income. Wildlife income is used for administration, field patrols, monitoring of hunts, problem animal control, water provision, and fire management. Communities have drilled boreholes, constructed seasonal roads, erected fencing to keep out wildlife, purchased tractors, and directed drought relief food. Children benefit from the construction of schools. Communities also benefit from the donation of elephant meat.

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)

0000080887
SUBMITTED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Lodzi Hunters (Pvt) Ltd	**Client's Full Name**	Jonathan Grant Jones
ZTA (HOP) No.	HOP0181	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	KABUBA CAMP, KARIANGWE MISSION LUSULU CAMPFIRE CONCESSION BINGA lodzi@outlook.com	**Address**	(b) (6) Pelham, New York 10803, U.S.A.
Name of Professional Hunter	MARTHINUS KOK	**Licence No.**	553
Telephone		**Fax**	232331
Number of Accompanying Guests			0
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	CHIPITANI SAFARI COMPANY P/L	**Address**	8 RIVONIA ROAD MOUNT PLEASANT HARARE
Name of Shipping Agent	LD FORWARDING CO. LTD	**Address**	P O BOX GD467 GREENDALE HARARE TEL 492650
Name of Foreign Agent	TWO DEES ENT	**Address**	P.O. BOX 785 FRANCISTOWN BOTSWANA

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Tsholotsho District Area 2 - South	Matabeleland North	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	06-08-2018
Date of Safari To	23-08-2018
Daily Rate Charged For Big Game USD	1,350.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA

(b) (6)

THE CASHIER
ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
6 - AUG 2018
BULAWAYO REGIONAL OFFICE
TEL / FAX: 09-65592 / 74000

Rec 113037(

Rec 1130448 - 2W067/sco/2018

Element Tea

04/09/2018

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

Specified officer's signature and date-stamp

Cert. № 127029

Name JONATHAN C. JONES

[redacted]

Address PELHAM, N.Y.
10803, U.S.A

Tusk serial number	Zw2018 23136
Tusk mass (kg)	26KG
Tusk length (metric)	165cm
Sex	M

Authority 80887

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.

04/09/18

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

Specified officer's signature and date-stamp

Cert. № 127030

Name JONATHAN G. JONES

[redacted]

Address PELHAM, N.Y.
10803, U.S.A

Tusk serial number	Zw2018 23137
Tusk mass (kg)	20KG
Tusk length (metric)	119cm
Sex	M

Authority 80887

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.

[EXTERNAL] Supplement to all outstanding Zimbabwe Elephant Permits - CAMPFIRE document

Aimee Korver <permits@conservationforce.org>

Tue 6/2/2020 4:57 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>

2 attachments (1 MB)

SupplementalLettertoUSFWS.zimbabweElephants.docx; CampfireConcernonImportBans.pdf;

Mr. Brisendine,

Please see the attached letter and document to be included with all applicants listed, which should be all outstanding elephant import permit applications for trophies coming from Zimbabwe that were filed through Conservation Force.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thank you,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
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PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

June 9, 2020

Amy Brisendine
USFWS/Division of Mgmt. Auth.
Via email @ amy_brisendine@fws.gov

RE: Supplemental Enhancement Document for **Elephant** import permit applications for applicants listed below – all in Zimbabwe

Atlas Cheek, III	33591C
Michael Condon	53018D
Daniel Crippen	58155C
David Crippen	57769C
Joe Easter	06118C
Brent Goyen	05190C
Arlene Hanson	03369C
John Johnson	53722D
Jonathan Jones	14862D
Donald Moritz	70854D
Jeffery Nicholas	10635C
Sam Noble	09883C
Sam Noble, Jr.	988649C
Sam Noble Jr.	09644C
Bryan Ottmers	85343C
Steve Reeves	84788C
Anthony Rogers	18507C
Stephen Shell	No PRT # (would like to get #)
Thomas Whaley Jr.	04847C
Todd Williams	76700D

Ms. Brisendine:

The document attached is to be included as supplement to all original import permit applications filed with the U.S. Fish and Wildlife Service listed above.

Since filing these applications we have received additional documentation of conservation efforts for elephants in Zimbabwe that further detail the elephant populations as stable and growing. The CAMPFIRE document strongly argues the importance of trophy imports and the

value that they provide to communities in Zimbabwe through income flows from tourism and hunting which serve to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat.

The Campfire document details the drastic effects that COVID-19 has had and is having on Zimbabwe's tourism and hunting market, which is in a state of collapse. It is leaving the country uncertain of how wild-life and anti-poaching programs will be supported on the ground in the coming months. This information can be used to predict what might transpire if trophy hunting and imports were to cease to exist and the tragic outcome it could have on the conservation efforts of wildlife in the area.

We ask that you please consider these documents when making your decision on enhancement in each import permit application.

Please feel free to contact me if you have any questions regarding this mater.

Cordially,

Aimee Korver
Permits Paralegal

Attachments
1. CAMPFIRE communities Concern on Import Bans

Open Letter to the United States Fish and Wildlife Service

Dear Dr Mary Cogliano

CAMPFIRE Communities Concern on Import Bans

CA/MPFIRE Association, otherwise known as the Community Areas Management Program for Indigenous Resources in Zimbabwe wishes to register its opposition to continuing campigns for the banning of trophy imports. We are fully aware that the general outrage in both print and social media against sport hunting, which many distant voices refer to as unethical, is aimed at influencing policy action by importing countires.. These arguments, none of which are supported by science, are based on a perfected art of global misinformation and do not represent the views of rural communities who live side by side with wildlife. To us as a people with substantial wildlife populations, trophy hunting is indispensable for conservation and rural livelihoods.

Zimbabwe has one of the most resilient and successful conservation programs in Africa. Its conservation efforts have historically enabled local communities to thrive on sustainable livelihoods in biodiversity-rich landscapes. At least 800 000 households or 2.5 million people (out of a national population of 16 million) benefit directly and indirectly from the sustainable use of wildlife and tourism related investments in their areas. However, our ever growing elephant population has increased the levels of conflict between humans and wildlife in recent years, which, together with recurrent droughts that threaten food security, have made traditional livelihoods more difficult, especially for subsistence farming communities that live in the wildlife rich areas of the country.

Communities in CAMPFIRE areas reside in an environment where conflict between humans and wildlife is common, as both compete for the limited available land and water resources. But this comes at a high price: people in Zimbabwe are paying with their lives for tolerating wild animals in their areas. As recently as 23rd March 2020, Barnabas Mwinga, a 50 year old man, was killed by an elephant in his field in front of his wife and young daughter in Gonono Ward, Mbire District. He is one of seven other people that have needlessly lost their lives to wildlife attacks throughout the country since the beginning of 2020, in addition to the 41 killed in 2019. Yet despite this high cost, wildlife is still highly valued by rural communities who continue to tolerate massive crop destruction and livestock losses from wildlife without compensation. For example, elephant poaching in Mbire District where Barnabas Mwinga was recently killed has gone down from a peak of 40 in 2010 to only 3 elephants poached in 2019 (Figure 1). The decline in poaching incidents is a result of collaborative efforts between the Safari Operator and the hunting clients who invest nearly $100,000 annually into an anti-poaching unit.

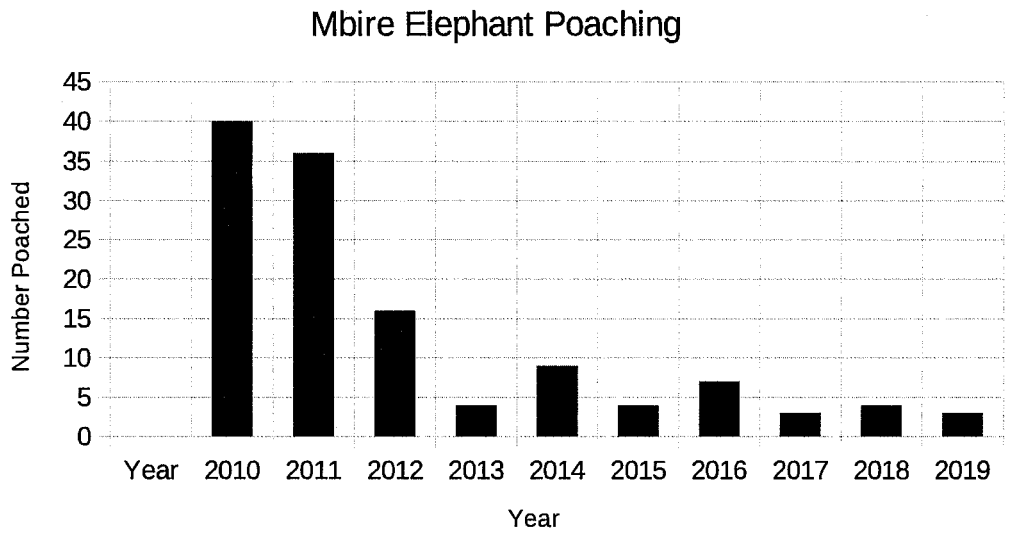

Figure 1: Mbire Elephant Poaching Trends (Source – Mbire Rural District Council)

The aim of the CAMPFIRE programme is to support sustainable community livelihoods in a way that promotes conservation of wild species and habitat. For nearly 30 years, trophy hunting, which relies heavily on the American market, has been cautiously implemented in the absence of other tourism opportunities to achieve this goal. Not only has it resulted in increasing food and livelihood security of rural people, it has also played a role in undermining the drivers of poaching and mitigating human and wildlife conflict. The net impact is seen in securing wildlife habitat and assisting in the regeneration of degraded landscapes.

The financial resources to succeed with this programme in CAMPFIRE areas are heavily dependent on the sustainable hunting of big game, especially elephants. The monies generated from these activities finance the local economies, social services as well as anti-poaching efforts and wildlife management at the District and Ward levels. For example, as can be seen from Table 1 below, the total number of elephants hunted as trophies over nine years is 807 out of a cumulative quota of 1381, from an estimated national population of 83,000 elephants. Hunting quotas are set at no more than 0.5% of the population estimate compared to an elephant population growth of 5% to 6% annually. The levels of off-take (58%) also demonstrate that while hunting is based on controlled numbers for each species annually, it is not uncommon for a client to pay for a full hunt and enjoy the wild experience, but not take a trophy. It is also important to note that communities do not view international hunting clients just as tourists, but as vital conservation partners.

Table 1: Trophy Hunting Quota Summary and Income: 2010-2018

All Districts:	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Quota	1381	171	608	2533	896	678	
Offtake	807	49	257	1104	391	439	
% Utilisation	58%	29%	42%	44%	44%	65%	
Total income	$7,632,656	$241,000	$532,675	$2,269,150	$700,100	$753,653	$12,129,234
Average/year	$1,056,819	$40,167	$88,779	$378,192	$116,683	$125,609	$2,021,539
% of income	52%	2%	4%	19%	6%	6%	
District Income	**Elephant**	**Lion**	**Leopard**	**Buffalo**	**Hippo**	**Crocodile**	**Total**
Beit Bridge	$659,256	$3,000	$58,300	$90,900	$14,000	$49,000	$874,456
Binga	$181,500	$6,000	$17,500	$16,800	$21,500	$162,500	$405,800

Bulilima	$511,700	$0	$7,000	$3,000	$0	$0	$521,700
Chipinge	$325,000	$0	$0	$6,000	$10,000	$20,000	$361,000
Chiredzi	$1,267,800	$0	$84,200	$337,000	$91,900	$89,700	$1,870,600
Hurungwe	$117,300	$21,000	$60,625	$40,800	$24,000	$53,000	$316,725
Hwange	$326,000	$0	$6,000	$2,500	$35,500	$45,000	$415,000
Mbire	$1,596,000	$101,000	$156,500	$1,020,750	$126,000	$84,000	$3,084,250
Nyaminyami	$594,600	$60,000	$130,050	$732,400	$376,200	$250,453	$2,143,703
Tsholotsho	$2,053,500	$50,000	$12,500	$19,000	$1,000	$0	$2,136,000
Total	**$7,632,656**	**$241,000**	**$532,675**	**$2,269,150**	**$700,100**	**$753,653**	**$12,129,234**
Average/year	**$1,272,109**	**$40,167**	**$88,779**	**$378,192**	**$116,683**	**$125,609**	**$2,021,539**

Source: *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program: Vernon Booth* (in progress).

District and Ward-level institutions in the CAMPFIRE areas rely on income from hunting to provide significant local livelihood benefits (income, jobs, skills) and social services (schools, clinics, irrigation schemes, boreholes) in remote regions where agriculture is marginal and there are very few jobs or other sources of cash income. Table 2 and Table 3 below summarise the impact of pre- and post-elephant trophy import suspension expenditure on the CAMPFIRE programme at the District and Ward level. The District administration costs absorb 89% of the budget with 30% devoted to law enforcement. With the suspension of elephant trophy imports to the USA and Europe in 2016, expenditure on law enforcement dropped from 33% to 9% as a result of District administration having to offset the human and wildlife costs which increased from 1% to 33%. At the Ward level, 46% of the budget is allocated to administration and 54% to community benefits (45% devoted to social services, Table 3).

Table 2: District level expenditure on administration and community benefits: 2010-2018

	Administration			**Community Benefits**			
All District Expenditure	**Administration**	**Law Enforcement**	**Management**	**Assistance to Wildlife Victims**	**Social Services**	**Total**	**Average/ year**
2010 - 2015	$2,525,053	$1,787,300	$688,462	$67,800	$323,275	$5,391,890	$898,648
2016 - 2018	$446,354	$85,052	$77,210	$294,157	$0	$902,772	$300,924
Total	**$2,971,407**	**$1,872,351**	**$765,672**	**$361,957**	**$323,275**	**$6,294,662**	$699,406
% 2010 - 2015	47%	33%	13%	1%	6%		
% 2016 - 2018	49%	9%	9%	33%	0%		
Overall %	**47%**	**30%**	**12%**	**6%**	**5%**		
	89%			11%			

Table 3: Ward level expenditure on administration and community benefits: 2010-2018

	Administration costs				Community Benefits					
Ward Expenditure	**Meetings & Admin**	**Wages/salaries**	**Management activities**	**Project Management Costs**	**Compensation schemes**	**Social services**	**Food security**	**Direct cash benefits**	**Total**	**Average/year**
2010 - 15	$562,655	$860,379	$314,164	$530,259	$56,477	$2,455,545	$225,069	$216,077	$5,220,625	$870,104.12
2016 - 18	$255,227	$310,407	$88,923	$129,894	$5,298	$527,841	$40,200	$0	$1,357,790	$452,596.53
Total	**$817,882**	**$1,170,786**	**$403,087**	**$660,153**	**$61,775**	**$2,983,386**	**$265,269**	**$216,077**	**$6,578,414**	**$730,934.92**
% 2010 - 15	11%	16%	6%	10%	1%	47%	4%	4%		
% 2016 - 18	19%	23%	7%	10%	0.4%	39%	3%	0%		
Overall %	12%	18%	6%	10%	1%	45%	4%	3%		
	46%				54%					

With growing awareness from several years of CAMPFIRE implementation, communities have been demanding their rightful place in the management of wildlife resources for their own benefit. To accommodate this, CAMPFIRE has undergone a review of its policy framework to enable communities to reap greater and more tangible benefits from living in harmony with nature. A key aspect of this review is to establish Community Conservancies that redefine ways in which communities can benefit more from wildlife and other income generation opportunities, as well as the mitigation of human and wildlife conflict. This initiative is being directed under the Global Environment Facility (GEF) 5 and 6 cycles covering five districts with the aim of developing innovative ways to improve the management of wildlife for the benefit or rural people. If trophy hunting and trade here was stopped, the impact on local livelihood would be severe, and both poaching and changes to alternative land use would increase. Non-consumptive tourism currently plays virtually no positive conservation role in the CAMPFIRE areas (<4% of overall income is generated through tourism). Instead of banning the import of trophies, more international oversight and support is needed from importing states, and of in-country CITES controls, to ensure sound sustainable management e.g. quota-setting, permit allocation, independent population surveys; building robust, equitable and transparent benefit allocation mechanisms at local level, particularly where communities have elected to invest their land and time in Community Conservancies.

STOP PRESS: The pressure for imports bans comes at the worst possible time as the Covid-19 pandemic has severely disrupted income flows from tourism and hunting. The collapse of both markets leaves rural people and safari operators with virtually no income, and it is uncertain how wildlife protection and anti-poaching programs will be supported on the ground in the coming months. What remains clear is that trophy import bans will seriously undermine conservation in Zimbabwe, and indeed open floodgates for rural people to destroy wildlife and wildlife habitat through conversion of land for other subsistence uses, even if unviable.

CAMPFIRE Association

For Sustainable Rural Development

CAMPFIRE Association
Mukuvisi Woodlands
Box 661
Harare
Tel: +263 772 599 102
www. campfirezimbabwe.org

April 21, 2020

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD NOV 15 2018

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Rossey	Michael	R.	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Cheney	WA	99004	Spokane	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

(b) (6) [redacted] and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the ***hapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and ief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

8/10/18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Mike Rossey (b) (6) [redacted]

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Safari company - Nyamazana Safaris
Professional hunter - Norman Crooks

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Collett's Wildlife Artistry

15 Josiah Chinamano Rd
Belmont, Bulawayo
Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

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: Outbound cargo and trophy exporters
Address: 5 Grantham Rd.
City: Belmont Bulawayo
State/Province:
Country, Postal Code: Zimbabwe

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Elephants in Zimbabwe are overpopulated in the Parks and reserves.

The population is increasing in communal lands.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

$10,000 was paid to the native community where the elephant was hunted. I also paid a game scout from the parks dept $80 per day. The fee paid to the community was used for the benefit of the tribal members.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Boreholes were drilled and maintained for the benefit of elephants and other wildlife.

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      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 information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

      country - Zimbabwe
      region - Metabele land
      concession/farm - Hankano Gwayi
      nearest city - Lupane

   b. Date wildlife was hunted:

      8/2/18 to 8/11/18

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature (b) (6) _____ Date: 8/21/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate

Less Commission

Other fees (Incidentals)

Percentage Commission Charged

Total Guests rate

Total Trophy fees

Grand Total USD

Total Processing Fees

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	Elephant	M	K	Hankano Guruyi	8183257.4° 5027125 9.2°	4/11/18	30lbs	
2								
3								
4								
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PARKS AND WILDLIFE MANAGEMENT AUTHORITY
WESTERN REGION
SENIOR RANGER OPERATIONS
01 AUG 2018

OUR REF : **GW/027**

25TH July 2018

The Director
National Parks & Wildlife Authority
Causeway
Harare

Dear Sir/ Madam

RE: APPLICATION FOR A SPECIAL HUNT PERMIT FOR ELEPHANT

Gwai Small scale Farmers Association has granted Nyamazana Safaris authority to hunt an Elephant within our jurisdiction as our 2016 Quota from National Parks and Wildlife.

The client below shall be hunting with the company. Kindly help them in processing their documents and cleaning firearm. **Details of the hunter are as follows:**

Actual Hunt Dates: 2nd AUGUST 2018 TO THE 11th OF AUGUST 2018
Client Name: MICHAEL ROSSEY
Country of Origin: (b) (6) CHENEY WA 9004, USA
Passport Number: (b) (6)
Hunting Area: GWAI SMALL SCALE FARMERS ASSOCIATION - MATABELELAND NORTH
Professional Hunter: NORMAN CROOKS
LICENCE NO. 428
Tras 2 # 80821

Quota Total: 1 X Elephant

Balance of quota 2018: 1 X Elephant;

Yours faithfully

T. Gumbo (Mr.)
For and on behalf of
Gwai small Scale Farmers Association

Suite 114-115 Unifreight House
L. Takawira & Fife Street
P.O Box 1501 Bulawayo Zimbabwe
Tell: +263 9 888091
Cell:0772 667 514

Together as one

The elephant I hunted was on communal land. The people living on the land are subsistence farmers. Elephants can be nuisance animals to them as they break fences and do significant damage to the corn they grow. If elephants are to be tolerated on communal lands, they have to have some economical value, otherwise they will be killed as problem animals or poached for ivory and left to rot.

The meat from the elephant I hunted was consumed by over 100 members of the community and will feed families for several months. The community also recieved $10,000. In a direct cash payment. Community members were also employed as scouts and camp staff providing much needed employment. The meat, employment and fees collected are a significant benefit to the community and give the elephant value far exceeding the damage they cause in the community.

When an elephant has a significant economic impact on the community, poaching among community members is viewed as stealing from everyone in the community and is discouraged.

Without the economic benefit that sport hunting provides to the community, elephants will not be tolerated on communal lands. In Zimbabwe, if elephant populations are to expand outside of government reserves and parks, sport hunting is necessary to provide the economic incentive for communities to tolerate the physical and economic damage they cause.

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

October 25, 2018

RCVD NOV 19 2018
RCVD NOV 19 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Import Application of Zimbabwe Lion Trophy for Frank Cavallo

Dear Chief Cogliano:

Enclosed please find the permit application to import an elephant trophy from Zimbabwe for Frank Cavallo . Also attached to the permit application is enhancement information provided by the Zambizi Hunters Safari Company. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zimbabwe authorities, outfitters, and others, in making an enhancement finding for lion trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Frank Cavallo's Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my applications for a permit to import a lawfully hunted LION trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: FRANCESCO CAVALLO M.D.

Date: 11/13/18

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD NOV 19 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: Lion Zimbabwe

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cavallo	Francescomaria	Tiberio	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b)(6)	(b)(6)	(b)(6)	(b)(6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (if Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
El Campo	Tx	77437	Wharton	U.S.A.

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and th[illegible] ***itle 50***, and I certify that the information submitted in this application for a permit is compl[illegible] nderstand that any false statement herein may subject me to the criminal penalties of 18 [illegible]

(b) (6)

11/13/18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Panthera leo, African lion

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted: 09/16/18

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   Zambezi Hunters

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   Trophy Consultants International 4 Josiak Chinamano Rd Belmont, Bulawayo, Zimbabw

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	TROPHY CONSULTANTS INTERNATIONAL
Business Name:	4 JOSIAH CHINAMANO ROAD
Address:	BELMONT
City:	BULAWAYO
State/Province:	ZIMBABWE
Country, Postal Code:	

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   See attached.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   $44,252

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

   See attached.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand [redacted] United States, cannot be re-exported.

    Applicant's signature: (b) (6) Date: 11/13/18

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SANGO
save valley conservancy

PABST HOLDINGS ZIMBABWE PRIVATE LIMITED

31 October 2018

Replies to questions posed by the US Fish and Wildlife Service for the Male Lion hunted by Mr Frank Cavallo.

For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. *Do you have any information regarding the population status or trend data on the species hunted?* *The male lion was hunted on Sango, a 60'000'Hec property within the Save Valley Conservancy (240'000' Hec) Sango carries a lion population of +/- 80 lion and the Save Valley has a population of 223 lion, these figures from the 2017 predator spoor survey. The lion population in the Save Valley has grown from a population of 40 in 2005 to 223 in 2018 due to good management, and abundant prey populations. The recommended sustainable hunting percentage for male lion is 8%,*
Sango could ask for 6 male lions, in the interests of conservation and sustainable utilisation, Sango normally hunts 2.

b. *In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?*

Total fees paid $..... The fees paid to Sango run the property, they help pay; 130 staff of which 44 are game scouts, water pumping and pipe line repairs, fire breaks, infrastructure maintenance etc. Sango also assists 4 local schools that are situated along its boundaries and maintains 9 community boreholes.

c. *Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?* *Sango was founded in 1993 and has since grown a sizable population of wildlife ,the property is funded by sustainable use conservation (Hunting). The success of Sango can be measured by the fact that Sango restocked 1300 plains game animals into the Gonarezhou and Zambezi National Parks in 2013 and translocated 100 elephant to the Rifa conservation area in the Zambezi Valley in 2018 due to over populations on Sango.*

Please contact me if any further information is needed; David Goosen sangohq@sango-wildlife.com

PABST HOLDINGS ZIMBABWE (PTY) LTD
trading as SANGO RANCH, P.O. Box 24, BIRCHENOUGH BRIDGE, ZIMBABWE
WEB: www.sango-wildlife.com * E-MAIL: sangohq@sango-wildlife.com
PHONE: +263 712 412 574 * +263 712 421 794 * +263 773 080 691

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

1. Name of area operator: ZAMBEZI HUNTERS

   a. Years in business: 40 YRS

   b. Name of company conducting hunt: ZAMBEZI HUNTERS

2. Name of concession: SAVUTI Size in km²: 6000

   a. Land tenure: __ Government lease __ Community __ Private ranch (Private conservancy

   b. Length of concession agreement: N/A Can it be renewed? __ Yes __ No N/A

   c. Length of renewal, if applicable: N/A

   d. Estimated total amount received in trophy fees last year, if applicable: $114 200

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   STANDARD CONCESSION OBLIGATIONS

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
   BOTSWANA, NEAREST CITY - KASANE INTERNATIONAL

   g. If the concession borders a national park, please provide the park name: N/A

   h. Description of general and distinctive habitat features and any water features:
   SAVUTI MARSH, MOREMI PARK, 9 DAMS IN MARSH

3. Are there any communities living in the concession? __ Yes (No)

   a. If so, estimated number of people or villages in the concession? N/A

4. Are there communities bordering this concession? (Yes) __ No

   a. If so, estimated number of people or villages around the concession? 3500

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	DENSE	450+	UP	AERIAL COUNT
Lion	DENSE	120	UP	" "
Leopard	DENSE	150	UP	" "
Prey species	DENSE		STABLE	" "

6. Total employment number: 130

   a. Please identify the number and type of all employees:

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Type:	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	[illegible]	
Trackers	[illegible]	
Anti-poaching scouts/rangers	44	
Other anti-poaching	[illegible]	
Cooks/housekeepers	19	[illegible]
Community coordinators	[illegible]	
Managers	[illegible]	
Biologists	1	
Others:	[illegible]	

7. Number of staff employed in the off-season: [illegible]

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff			
Managers			
Maintenance			
Road opening/construction	[illegible]		
Community relations personnel	[illegible]		
Others:			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: 44

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? [illegible]

   c. Months during which anti-poaching patrols are conducted: [illegible]

   d. Number of anti-poaching patrols per month: [illegible]

   e. Description of anti-poaching equipment, vehicles, etc.: [illegible]

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? [illegible]

   g. Do you offer rewards to poaching informants leading to arrest? (Yes) No

   h. Do you offer rewards to poaching informants upon conviction? Yes (No)

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? USD

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts			11 600	
Equipment			11 000	
Vehicles			NIL	
Petrol Diesel			12 120	
Rewards paid			3 000	
Other:				
Other:				
TOTALS			147 520	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered			16	
Elephant carcasses observed			NIL	
Lion carcasses observed			NIL	
Leopard carcasses observed			NIL	
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	
Other:				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? (Yes) ___ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? [illegible]

c. Does the company provide game meat to nearby communities? ___ Yes ___ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: [illegible]

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. NIL

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? USD

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other:				
Other:				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2 2016: 1 2017: 0	2015: 2 2016: 2 2017: 1	2015: 5 2016: 4 2017: 3	2015: 2016: 2017:
Percentage of U.S.	2015:	2015:	2015:	2015:

clients	2016: 1 2017: 0	2016: 2017: 1	2016: 2017:	2016: 2017: 11
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature:

Name: Title:

13 - Annual dart census of all animals species
- Maintenance of cage & trap sites & all camps boreholes
- 40 cage new boreholes
- Significant investment in camps
- Continual research about
- Artificial water provision
- Artificial water provision for property
- Employ ecologist employed to monitor wildlife
- Total cost of management [illegible] Revenue from hunting and [illegible]

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD NOV 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 under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Strickler	James	David	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Magnolia	Texas	77354	Montgomery	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country
Magnolia	Texas	77354	Montgomery	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 [redacted] that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 11-14-2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form ( ) 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 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

James David Strickler (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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 information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Zimbabwe, Africa, Masikile Ranch, Matetsi Eastern Block Safari Area in Hwange District, 40 Kms northeast of Hwange and 60 Kms southwest from Victoria Falls on the east side of Hwy A8

b. Date wildlife was hunted:

September 24, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Tshabezi Safaris: PH Monty Jenkinson (license #162)

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Masikile Ranch, Matetsi Eastern Block in Hwange District, Zimbabwe, Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). see Attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Outbound Cargo and Trophy Exporters- Contact Person M. Nash
Address:	5 Grantham Road
City:	Belmont, Bulawayo
State/Province:	Zimbabwe
Country, Postal Code:	Africa +263(0) 9 881531-3

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

The population of Elephant is nearly double Zimbabwe's holding capacity-there are about 85,000 elephant and the holding capacity is around 45,000. The bulk of these numbers are in/around 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, local community, or government?

The area consists of small scale farms that group together to get a quota-when a trophy is taken the fees are then split with 50% going to the farms and 50% for anti-poaching, water development and administration. All the meat and most of the hide is distributed to the community-nothing goes to waste.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

The main benefit is the anti-poaching teams that are paid monthly to scout and protect the area from poaching.Hunting also funds community employment,helps with problem animal control destroying crops so the animal has value-they want to protect rather than poison or poach the elephant.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature [redacted] Date: 11-14-2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from . If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 21 September 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Tshabezi Safaris who have applied for extension of their permit to hunt 1 x elephant with client David Strickler in the following properties:

- Matetsi Eastern Block Safaris in Hwange District Matebeleland North Province.
- Isla Farm in Hwange District Matebeleland North Province.

The original dates were from 17 September 2018 to 22 September 2018 and they want to extend the dates of their hunt to end on 26th of September 2018 under the guidance of professional hunter Monty Jenkinson PH license #162.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

Recommended/ ~~Not Recommended~~.....pp..... 21/09/18
Investigation and Security Manager Date

Approved/ ~~Not Approved~~.....pp..... 21/09/18
Head Management Services Date
For and on behalf of the Director General

R

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
08 OCT 2018
P.BAG 5926
VICTORIA FALLS

Specified officer's signature and date-stamp

Cert. N° 123642

Name David Strickler

(b) (6)

Address Magnolia Tx 77354
United States

Tusk serial number	Zim 2018-260136
Tusk mass (kg)	7kg
Tusk length (metric)	128 cm
Sex	Male

Authority CR 1151

Signature of holder (b) (6)

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.

L

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
08 OCT 2018
P.BAG 5926
VICTORIA FALLS

Specified officer's signature and date-stamp

Cert. N° 123641

Name David Strickler

(b) (6)

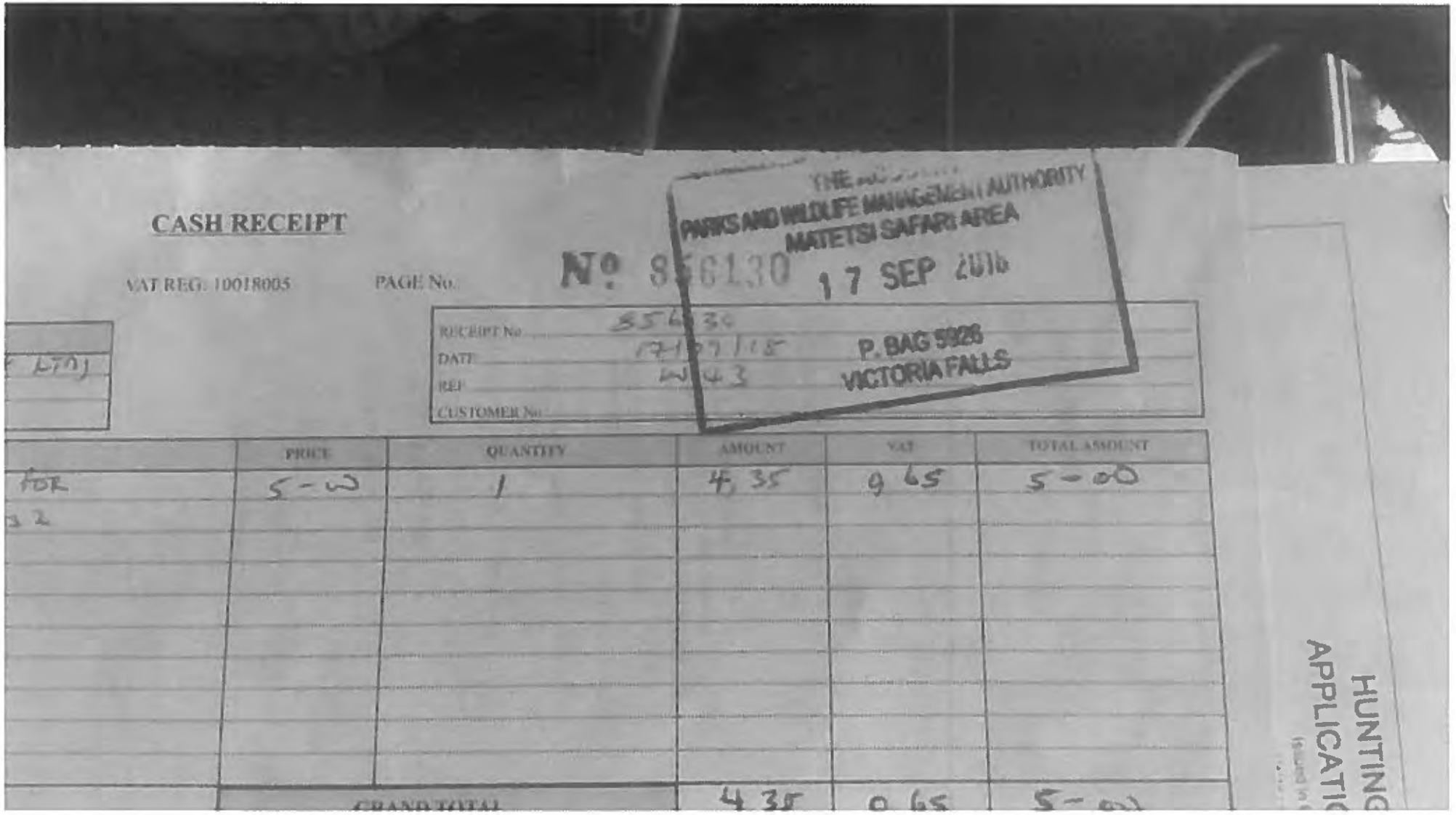
Address Magnolia Tx 77354
United States

Tusk serial number	Zim 2018-260135
Tusk mass (kg)	7kg
Tusk length (metric)	131cm
Sex	Male

Authority CR 1151

Signature of holder (b) (6)

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.



CASH RECEIPT

VAT REG: 10018005 PAGE No.

Nº 856130

THE ... PARKS AND WILDLIFE MANAGEMENT AUTHORITY MATETSI SAFARI AREA 17 SEP 2016 P. BAG 5926 VICTORIA FALLS

RECEIPT No. 856130
DATE 17/09/16
REF WL43
CUSTOMER No.

	PRICE	QUANTITY	AMOUNT	VAT	TOTAL AMOUNT
FOR	5-00	1	4,35	0 65	5-00
	GRAND TOTAL		4 35	0 65	5-00

HUNTING APPLICATIO

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

0000081
SUBMIT

AILS OF THE SAFARI OPERATOR

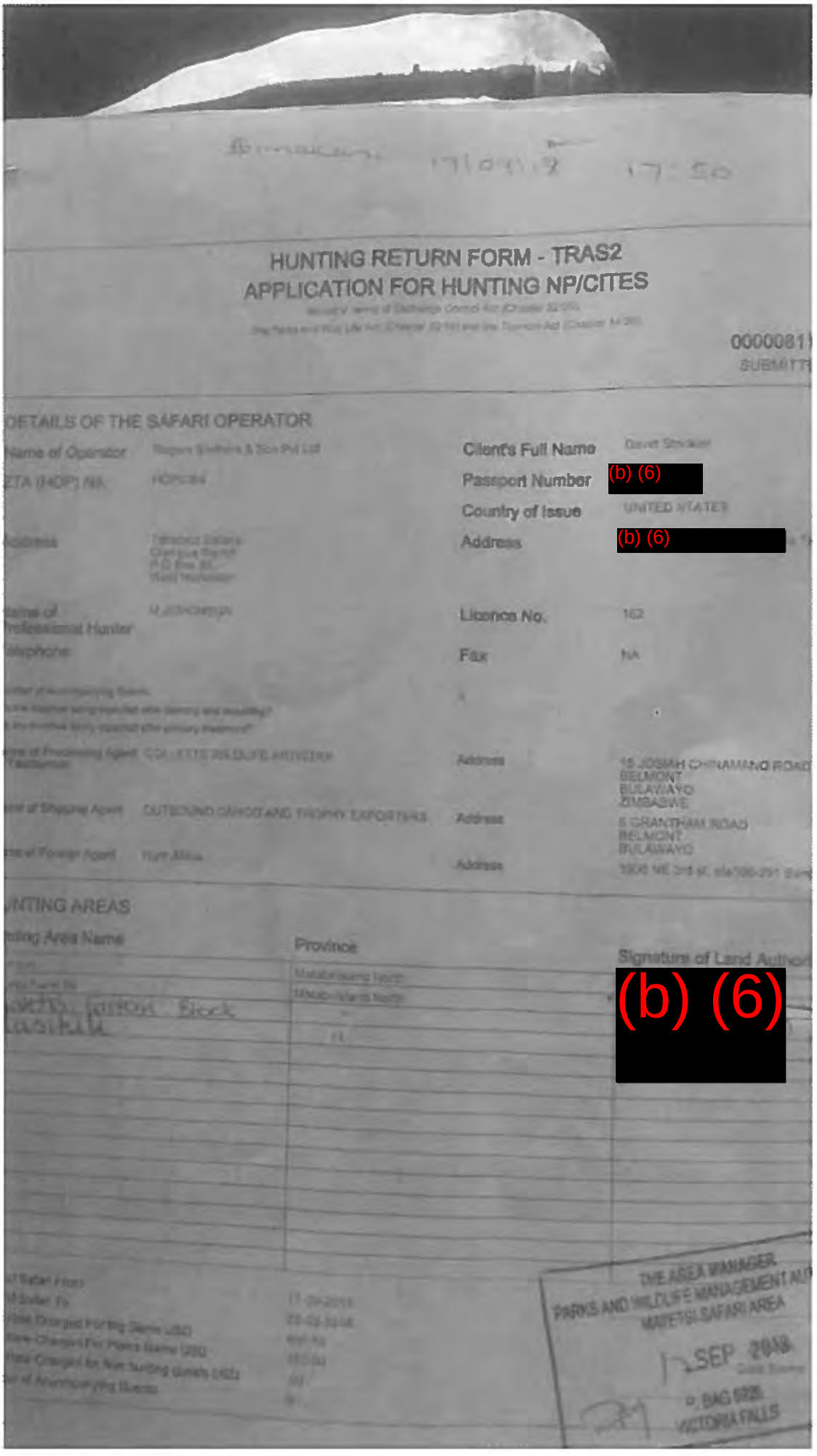
Client's Full Name	David Sandler
Passport Number	(b) (6)
Country of Issue	UNITED STATES
Address	(b) (6)
Licence No.	162
Fax	NA
Address	15 JOSIAH CHINAMANO ROAD BELMONT BULAWAYO ZIMBABWE
Address	5 GRANTHAM ROAD BELMONT BULAWAYO
Address	

TING AREAS

Area Name	Province	Signature of Land Author
	Matabeleland North	
	Matabeleland North	
	"	
	"	

(b) (6)

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AU
MATETSI SAFARI AREA
12 SEP 2018
P. BAG 5926
VICTORIA FALLS



HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

17/09/18 17:50

00000811
SUBMITTED

DETAILS OF THE SAFARI OPERATOR

Name of Operator: Rogers Safaris & Sons Pvt Ltd

ZETA (HOP) NR: HOP0364

Address: Tshokwe Safaris
Olympus Square
P.O. Box 30
Victoria Falls

Name of Professional Hunter: M.JOHANNSEN

Telephone:

Client's Full Name: David Stricker

Passport Number: (b) (6)

Country of Issue: UNITED STATES

Address: (b) (6)

Licence No.: 162

Fax: NA

Name of Processing Agent: CONSERVATION WILDLIFE MANAGEMENT
Address: 15 JOSIAH CHINAMANO ROAD
BELMONT
BULAWAYO
ZIMBABWE

Name of Shipping Agent: OUTBOUND GAME AND TROPHY EXPORTERS
Address: 6 GRANTHAM ROAD
BELMONT
BULAWAYO

Name of Foreign Agent: Hunt Africa
Address: [illegible]

HUNTING AREAS

Hunting Area Name	Province
[illegible]	[illegible]
[illegible]	[illegible]
[illegible]	[illegible]
[illegible]	[illegible]

Signature of Land Author

(b) (6)

Safari From: 17-09-2018
Safari To: 22-09-2018
Fees Charged For Big Game USD: 4000.00
Fees Charged For Plains Game USD: 1500.00
Fees Charged for Non-hunting Goods USD: 00
No. of Accompanying Guests: 0

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTH
MATETSI SAFARI AREA
17 SEP 2018
Date Stamp
P. BAG 5926
VICTORIA FALLS

Julia Butzler

May 2, 2019

U.S. Fish and Wildlife Service

Division of Management Authority

Branch of Permits, MS: IA

RCVD MAY 07 2019

5275 Leesburg Pike, Falls Church, VA 22041

Good Afternoon Julia,

Per our conversation I am sending you a copy of the CITES permit for the import of the elephant ivory from my Zimbabwe hunt September 24, 2018. Please let me know if all is in order or if any additional information or forms are necessary. The tusks are currently at the taxidermist in Bulawayo, Zimbabwe.

The original application and check was received by your office on 11/20/2018 at 9:53am and signed for by Darryl. The check has been processed and I have included a statement from the bank showing check number 12874 was processed electronically on 12/18/2018 for the amount of $100. The bank stated the method the check was processed prevents them from having a photo copy of the cancelled check.

I appreciate your help in this matter. Please feel free to contact me at any time if I can be of assistance.

Regards,

(b) (6)

James David Strickler

(b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

[redacted]

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 II of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1 a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Strickler	James	David	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1 b. Doing business as (DBA)	
2 Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5 Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7 c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Magnolia	Texas	77354	Montgomery	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f Country
Magnolia	Texas	77354	Montgomery	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)

(b) (6)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form ( ) 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 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

James David Strickler (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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 information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Zimbabwe, Africa, Masikile Ranch, Matetsi Eastern Block Safari Area in Hwange District, 40 Kms northeast of Hwange and 60 Kms southwest from Victoria Falls on the east side of Hwy A8

b. Date wildlife was hunted:

September 24, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Tshabezi Safaris: PH Monty Jenkinson (license #162)

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Masikile Ranch, Matetsi Eastern Block in Hwange District, Zimbabwe, Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). see Attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Outbound Cargo and Trophy Exporters- Contact Person M. Nash
Address:	5 Grantham Road
City:	Belmont, Bulawayo
State/Province:	Zimbabwe
Country, Postal Code:	Africa +263(0) 9 881531-3

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

The population of Elephant is nearly double Zimbabwe's holding capacity-there are about 85,000 elephant and the holding capacity is around 45,000. The bulk of these numbers are in/around 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, local community, or government?

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The main benefit is the anti-poaching teams that are paid monthly to scout and protect the area from poaching.Hunting also funds community employment,helps with problem animal control destroying crops so the animal has value-they want to protect rather than poison or poach the elephant.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

    Applicant's signature: _____ Date: _____

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from . If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 21 September 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

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- Isla Farm in Hwange District Matebeleland North Province.

The original dates were **from 17 September 2018 to 22 September 2018** and they want to extend the dates of their hunt to end **on 26th of September 2018** under the guidance of professional hunter Monty Jenkinson PH license #162.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

Recommended/ Not Recommended..... 21/9/18

Investigation and Security Manager **Date**

Approved/ Not Approved..... 21/09/18

Head Management Services **Date**

For and on behalf of the Director General

HUNTING RETURN FORM - TRA52
APPLICATION FOR HUNTING NP/CITES

0000051

...ILS OF THE SAFARI OPERATOR

...of Operator

...HCB) No

...of ...ational Hunter

...ione

Client's Full Name (b) (6)

Passport Number

Country of Issue

Address

Licence No: 162

Fax: NA

...Processing Agent

Address: 1b CHIRCHINAMAND ROAD BELVONT BULAWAYO ZIMBABWE

...Shipping Agent: CHIEFTAIN CARGO AND TROPHY EXPORTERS

Address: 5 GRANTHAM ROAD BELMONT BULAWAYO

...Foreign Agent: Last Minute

Address:

...TING AREAS

...g Area Name	Province
[illegible]	[illegible]

Signature of Land Authority (b) (6)

...ation Fee/s

...ation To

...s Charged For Big Game USD

...s Charged For Plains Game USD

...s Charged for Non hunting species USD

...of Accompanying Guests

17-09-2018

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
17 SEP 2018
P BAG 5930
VICTORIA FALLS

HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

DETAILS OF THE SAFARI OPERATOR

Client's Full Name (b) (6)
Passport Number
Country of Issue
Address

Licence No.
Fax

Address

Address

Address

HUNTING AREAS

Hunting Area Name | Province

Signature of Land Owner (b) (6)

Date Valid From
Date Valid To
Rate Charged For Big Game USD
Rate Charged For Plains Game USD
Rate Charged for Non-hunting guests USD
Number of Accompanying Guests

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
SEP 2013
P. BAG 5926
VICTORIA FALLS

CASH RECEIPT

VAT REG: 10018005 PAGE No:

No. 95120

17 SEP 2010

PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA

RECEIPT No:
DATE
REF
CUSTOMER No:

(b) (9)

P. BAG 5926
VICTORIA FALLS

	PRICE	QUANTITY	AMOUNT	VAT	TOTAL AMOUNT
HDL	5-00	1	4.35	0.65	5-00
	GRAND TOTAL		4.35	0.65	5-00

HUNTING
APPLICATIC

R

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
08 OCT 2018
BAG 5926
VICTORIA FALLS

Specified officer's signature and date-stamp

Cert. No 123642

(g) (g)

Addres (g) (g)

United States

Tusk serial number	ZW 2018 250 R6
Tusk mass (kg)	7kg
Tusk length (metric)	128 cm
Sex	Male

Authority C.S.I (g) (g)

Signature of holder

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.

L

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
08 OCT 2018
BAG 5926
VICTORIA FALLS

Specified officer's signature and date-stamp

Cert. No 123641

Name David Strickler

(g) (g)

United States

Tusk serial number	Zw 2018-250 R5
Tusk mass (kg)	7kg
Tusk length (metric)	131cm
Sex	Male

Authority C.S. (g) (g)

Signature of holde

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.

RCVD MAY 08 2019

LB

TAKESHI HAYAKAWA

(b) (6) [redacted]

May 2, 2019

Ms. Darcy Vargas
U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS:IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

Dear Darcy,

As I mentioned in my e-mail, I just received the Acknowledgement letter for permit No.38511D on 4/26 and I realized that I forgot to send the $100 check for the processing fee.
Enclosed please find the check for $100 for processing fee for PRT identification number US38511D/9.
Please apply this check for the US38511D/9.

If you have any questions, please let me know.
I often travel to Japan, but you can always reach me via e-mail.

Thank you again for your help.

Sincerely,

Takeshi Hayakawa

MacDonald, Tim <tim_macdonald@fws.gov>

Sport Hunted Trophy Applications

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Fri, Sep 27, 2019 at 1:59 PM
(b) (6)

James,

It was brought to my attention that we have two application in our system for the same elephant trophy. The Prt #'s are 16392D and 39937D.

I am moving all of the information from Prt # 39937D into the original permit application 16392D.

Please be aware that the permit application you will need to use to communicate with us is ***Prt # 16392D.***

Thank you,

Tim Mac Donald

Government Information Specialist
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

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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November 12, 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD NOV 23 2018

RE: Import Application of Namibia Elephant Trophy for George Kopecky

Dear Chief Cogliano:

Enclosed please find the permit applications to import an elephant trophy from Namibia for George Kopecky. Also attached to the permit applications is an operator enhancement questionnaire provided by Huntafrica Namibia Safaris. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Namibia authorities, outfitters, and others, in making an enhancement finding for lion and leopard trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- George Kopecky Elephant Permit Application, 100.00 Check and Notice of Representation
- Huntafrica Namibia Safaris Operator Enhancement Questionnaire
- Labeled FedEx Return Envelope for Elephant Permit

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted 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.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: GEORGE KOPECKY

Date: 11/12/18

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD NOV 23 2018 LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity: Namibia Elephant
~~IMPORT OF SPORT-HUNTED TROPHIES~~
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
KOPECKY	GEORGE	FRANK	SR.

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide B... address in this block; U.S. hunters must provide their U.S. address)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
COLUMBUS	TEXAS	78934	COLORADO	U.S.A.

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)
SAME.

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other a... ***Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and a... and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 10...

(b) (6)

11/8/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1.** If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

   SAME AS PAGE 1 , PRE-PAID FED EX ENVELOPE INCLUDED

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.
   AFRICAN ELEPHANT, LOXODONTA, 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:
   NAMIBIA, BWABWATA WEST NATIONAL PARK
   S 18 09° C 162, E021 42° C495
   NEAREST CITY, RUNDU

   b. Date wildlife is to be hunted: JULY 24 – AUGUST 9, 2019

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   HUNTAFRICA NAMIBIA 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:

   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

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].

PROFESSIONAL HUNTER:
Name: J.H. PIENAAR
Business Name: HUNTAFRICA NAMIBIA SAFARIS
Address: P.O. BOX 1100
City: GOBABIS
State/Province:
Country, Postal Code: NAMIBIA
PHYSICAL ADDRESS: FARM HESTER 407 & FARM GOOD HOPE 397, GOBABIS, OMAHEKE, NAMIBIA

PERSON/ BS. SHIPPING TROPHIES:
SEE ATTACHED NEXT PAGE

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 NEXT PAGE.

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   TROPHY FEE # 43,500
   SEE ATTACHED NEXT PAGE ON HOW USED

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

   SEE ATTACHED NEXT PAGE.

8. Person / Business shipping your trophies:

Louw Nel
P O Box 21068
Windhoek
Namibia
+264 61 232 236
+264 61 220 862
www.trophaendienste.com

TROPHÄENDIENSTE
TAXIDERMY

9. a.) The population is growing; you will see herds of up to 500 at a time, Elephants are resident in this area, with a game count in Oct 2017 of more than 2000 elephants counted. (Namibia population 26,000)

9.b)40% of trophy fees go to the government – Game Products Trust Fund, the funds are used for repairs, maintenance, salaries for government rangers on areas where elephants roam.
Another 40% go to the community, the communities use the funds to pay game guards and also for the upliftment of the KWE people.

9.c)Outfitters have informers that we pay to do anti-poaching.
PH is a trustee on HUAP Trust (Hunters united against poaching)

GEORGE KOPECKY
FEDERAL FISH AND WILDLIFE PERMIT APPLICATION FORM)

ANSWERS TO PAGE 4 QUESTIONS

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 ra[redacted] into the United States, cannot be re-exported.

    Applicant's signature: _____ (b) (6) _____ Date: 11/8/2018

    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.

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).

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^2: 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) . Map follows

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

NNING MAP

ZAMBIA

Newest City

Rundu

Nyangani

Mukwe

Andara

Bagani

BWABWATA GAME PARK

Muhembo
06:00 - 18:00
Shakawe

Wenela
06:00 - 18:00
Sesheke

Katima Mulilo

CAPRIVI

Kongola

Chinchimane

Linyanti

Ngoma

Sangwali

MAMILI NATIONAL PARK

BOTSWANA

BOTSWANA

Tsumkwe

GEORGE KOPECKY
FEDERAL FISH AND WILDLIFE APPLICATION FORM
OPERATOR ENHANCEMENT QUESTIONNAIRE
24

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Arandis.....D-6
Aranos.....I-8
Ariamsvlei.....1-2
Aroab.....I-10
Aus.....F-10

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Bagani.....K-2
Berseba.....G-9/10
Bethanien.....G-10
Bitterwasser.....G-7
Buitepos.....I-6

-C-

Cape Cross.....C-5

Ogongo.
Okahand
Okahao.
Okakara
Okalong
Okamata
Okaukue
Okongo.
Omatako
Omaruru
Omitara
Omuthiy
Onankal
Ondangw
Onesi..
Ongwadi
Opuwo..
Oranjem

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	Dense 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:[2]

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

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 Enviorment_____

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: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated				
Vehicles confiscated				
Bicycles confiscated				

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Boats/nets confiscated				
Tusks recovered				
Carcasses observed				
Other: _____				

10. Community investment:[3]

    a. Does the company contribute money or goods/services to local communities? __ Yes

    b. If so, what percentage or amount is shared, how often, and why 2 Miljlion 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?

    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	-			

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

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			
Construction materials donated	N$500,000			
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 Enviorment 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: (b) (6) [redacted]

Name: James W. Chapman Title: Co-owner of Concession

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

August 28, 2019

RCVD SEP 6 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: WITHDRAW PRT No. 16667D

Dear Chief Cogliano:

Please be advised that George Kopecky is withdrawing his application for a elephant trophy from Namibia.

PRT No. 16667D

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

CONSERVATION FORCE

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BOARD OF DIRECTORS:

16667 D
Needs scanning

August 28, 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
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Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

LB

RCVD DEC 04 2013

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Cabela	Richard	J	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6) [redacted]			(b)(6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b)(6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Sidney	NE	69162	Cheyenne	USA
2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

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)?

Rich Cabela (b)(6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   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:

   Nambia, Bwabwata Wet National park, S 18 09 C 162 E021 42 C 495, Rundu (town) Divundu (town).

   b. Date wildlife was hunted:

   08/12/2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Huntafrica Namibia 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]:

Kings Taxidermy 27 Bahnoff Str Otijwarongo 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).
Included - 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:	Koos Pienaar
Business Name:	Huntafrica Namibia Safaris
Address:	PO Box 1100
City:	Gobabis
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?

See attached documents

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 documents

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 documents

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 signatur[redacted] Date: 11-17-18

    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).

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		181464
VALID FROM:		26.07.18
VALID TO:		23.08.18
RECEIPT No.:		5754481

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: R.J. Cabela

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common	1X	Springbok		Other	
Buffalo	1X	Klipspringer		Steenbok		*Report within 48hrs after hunt - *Advert must be in accordance with Reg 106 no 3554 1967 of Nature Cons Ord 4 of 1975 Comercial	
Crocodile		Kudu	1X	Warthog	1X		
Dik-Dik		Lechwe		Waterbuck			
Eland		Oryx (Gemsbok)		Wildebeest, Black			
Elephant	1X	Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck	1X	Zebra Burchell's			
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: BraBrata West

Guided by (name of guides): J.H. Pienaar (Sr)

MINISTRY OF ENVIRONMENT & TOURISM
ISSUING OFFICER (NAME & SIGNATURE)
UNDER THE AUTHORITY OF THE MINISTER, PURSUANT TO THE TERMS OF SECTION 78 (1) OF THE STATE FOR CONSERVATION ORDINANCE, 1975 (ORD 4 OF 1975)

Official MET date stamp

2018 -07- 26

IMPORTANT: This permit is not valid if altered in any way

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 guid Hunting guide
5 -8.18.	ELEPHANT							6	♂				(b) (6)	
			REPORT BACK TO RIVERDA ON 14-8-2018.											

= Left, R=Right, H=Horn, B=Base, RW=Rowland Ward

› trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.

is permit must be kept on the person of the permit holder at all times while hunting.

ıly guide(s) as specified on the permit may conduct the hunt.

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 04567

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant: R J Cabela

2. Identity No. / Passport No.: USA

3. Residential address: Tel No.:

4. Postal address: P.O. Box 21068 Windhoek

SIGNATURE OF APPLICANT

5. From where are products obtained: Bwabwata West

6. The following documents are attached as proof of ownership:

(a) Permit NO: 181464

(b)

(c)

(d)

(e)

MINISTRY OF ENVIRONMENT AND TOURISM KONDU 2018

26.09.2018

DATE

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
Elephant	Tusk R	138	159	37	38	57	17.66	
	Tusk L	131	157	38	38	53	17.92	
	Feet x 4							
	Ears x 2							
	Pannels x 6							
	Tail x 1							

prime pres

Republic of Namibia

MINISTRY OF AGRICULTURE, WATER AND FORESTRY

5c

Telephone: +264-61-61-276 592
Fax: +264-61-303 151

DIRECTORATE OF VETERINARY SERVICES
Private Bag 12022
Windhoek
NAMIBIA

Permit no: TR38/2018

Date of issue: 18 SEPTEMBER 2018 Expiry Date: 18 DECEMBER 2018

VETERINARY PERMIT FOR HIDES/ SKINS/TROPHIES INFECTIOUS THINGS FROM ANIMALS SUSCEPTIBLE TO FOOT AND MOUTH DISEASE ORIGINATING FROM AREAS NORTH OF THE VETERINARY CORDON FENCE
(Issued in terms of the Animal Act, no.1 for 2011)

Authority is hereby granted to:
Name: **LOUW NEL**
Address: **P. O. BOX 21068 WINDHOEK, NAMIBIA**
Telephone: **085 554 7579**

to move south of the veterinary cordon fence the following:

SPECIES	TUSKS	SKINS	SKULL	SCROTUM	EAR	FEET
ELEPHANT	6	21		3	6	12
BUFFALO		8	6	1		
HIPPO	8(SET)	3	1	1		
SABLE		4	2			
KUDU		8	4			
IMPALA		1	1			
WARTHOG	2(SET)		2			
LECHWE		4	2	2		

From **BABWATA CONCERVENCY , – TROPHY HUNTING KAVANGO REGION** (quarantine facility)

To **TROPHAENDIENSTE TAXIDERMY, KAPPS FARM PLOT 65/16, WINDHOEK**
(Address of approved tannery)

Subject to the following conditions:

1. The applicant accepts the sole responsibility of ensuring that the conditions below have been complied with, and understands his/her duty in this regard.
2. The hides/ hides skins infectious things must be accompanied by this ORIGINAL PERMIT.
3. The hides and skins/infectious things must be loaded into previously approved airtight containers and SEALED under veterinary supervision.
4. The consignment should be presented to the State Veterinarian **RUNDU** telephone **066-255016** in sealed containers. The state veterinarian **RUNDU** must break the seals and inspect the trophies, hides& skin to verify that the products were quarantined north of the veterinary cordon fence and were subjected to one of the following treatment before granting permission to move south of the veterinary cordon fence.

5. a) Hide and skins:* wet-salted in sea salt with addition of 2% washing soda (Na_2CO_3) for at least 30 days before dispatch OR * sprayed with 5% washing soda (Na_2CO_3) followed by official quarantine for 30 days before dispatch. OR *sprayed with 5% formalin followed by official quarantine for 30 days before dispatch.

b) Trophies consisting solely of horns, bones, hooves, claws, antlers and teeth must:

(i) Be immersed in boiling water for an appropriate time so as to ensure that any matter other than horn, bone and teeth is removed; followed by official quarantine for 30 days OR

(ii) have been soaked with agitation in a formic acid solution (100 kg salt (NaCl) and 12 kg formic acid per 1000 liters of water) maintained at below pH 3.0 for at least 48 hours followed by official quarantine for at least 30 days OR

(iii) Soaked with agitation in a 4% (w/v) solution of sodium carbonate (washing soda, Na_2Co_3) maintained at pH 11.5 Or above for at least 48 hours followed by official quarantine for at least 30 days.

6. The State Veterinarian **WINDHOEK** (South of VCF) must be advised by telephone or fax of the probable arrival time of arrival at the taxidermist/tannery/quarantine facility south of the veterinary cordon fence and the seals may not be broken without permission or veterinary supervision. Trucks must immediately proceed to the approved taxidermist/tannery or quarantine by the most direct route via the main tarred road.
7. After off-loading the containers/vehicles must be disinfected to the satisfaction of the Veterinary official.
8. This permit is valid for one consignment only and cannot be used after the expiry date.

Signature..... Name in full .....
CHIEF VETERINARY OFFICER

(5c HS 10 /12)

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

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^2: 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

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	Dense 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:[2]

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

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 Enviorment_____

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: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated				
Vehicles confiscated				
Bicycles confiscated				

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Boats/nets confiscated				
Tusks recovered				
Carcasses observed				
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? __ Yes

b. If so, what percentage or amount is shared, how often, and why 2 Miljlion 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	-			

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

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			
Construction materials donated	N$500,000			
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 Enviorment 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: _____ Title: _____

BwabwataWest National park, which is our hunting concession – GPS Co-ordinates:
S 18 09°C 162
E 021 42°C 495

MAIL ROOM ROUTING SLIP

Section 1 – To be completed by mail room staff only.

Type: ❑ E-26 ❑ E-27 ❑ E-33 ❑ Brief ❑ MTReo/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: _____ (b) (6) _____ **Date:** _____

Comments: Wrong Address Carirer 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

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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 68532
(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.

V (b) (6)

Max Aaron Caldwell

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
CALDWELL	MAX	AARON	

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

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Section C: All applicants complete address information

1.a. Physical address (Street address: Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Lincoln	Nebraska	68532	Lancaster	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 ...e statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

04/03/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

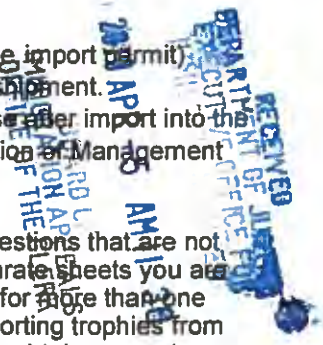
Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.



Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   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 AARON 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, 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, 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:
David 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 currenty 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

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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 watertanks 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 leopar(b) (6)

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.

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CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

Originator Control No. 0053042

0053042

Original

[X] EXPORT

[ ] RE-EXPORT

[ ] IMPORT

[ ] OTHER:

SKAT København 16 NOV. 2017 Helle Sørensen

2. Valid until: 13/12/2017

3. Importer (name and address)
Max Aaron Caldwell
First Class Trophy
Randersvej 397
DK-Trige-8330 2017 02 513871

4. Exporter / Re-exporter (name,address and country)
Dawid Muller
P O BOX 1059
Otjiwarongo
Namibia

Signature of the applicant

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 Nordsjælland - København

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.: 1505980 12

	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. 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 ***	
B	7./8. *Loxodonta africana* African elephant	9. 2x ears, 8x skin panels, tail & trunk	10. II 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 ***	
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 progated for commercial purposes
*** for pre-Convention specimens

MINISTRY OF ENVIRONMENT AND TOURISM REPUBLIC OF NAMIBIA 13 JUN 2017

13. THIS PERMIT IS ISSUED BY: J. Shapi

Windhoek — Place

13/06/2017 — Date

Windhoek 58861

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Landing / Air Waybill Number: 2740202754 5A

Block	Quantity
A	2
B	12
C	
D	

Walv.

Port of Export / Re-export

Date

Signature

Official stamp and title

REPUBLIC OF NAMIBIA MINISTRY OF FINANCE Customs & Excise 2017-09-28 WALVIS BAY VALIDATION

Original

Namprint: 2308

Wynand Louw
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
http://www.firstclasstrophy.dk

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Michael R. Lewis
Senior Trophy Specialist
mlewis@coppersmith.com
Tel: 847-437-1500 ext: 220
Fax: 847-437-1501
760 Bonnie Lane
Elk Grove Village, IL 60007

Barry , Anna <anna_barry@fws.gov>

Max Aaron Caldwell PRT #85601C

1 message

Barry , Anna <anna_barry@fws.gov> Wed, May 23, 2018 at 9:18 AM
To: (b) (6) [redacted]

Dear Mr. Max Aaron Caldwell,

The following is in response to your phone call earlier today.

In response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service is revising its procedure for assessing applications to import certain hunted species like African elephants. We are withdrawing our countrywide enhancement findings for a range of species across several countries. In their place, the Service intends to make findings for trophy imports on an application- by-application basis. The President has been very clear in the direction that his administration will go.

Please be aware that we continue to seek additional information directly from the relevant foreign Government Authorities to support our permit findings, therefore, applications are still under review.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT You may have noticed that our application forms expired 5/31/2017 . The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

Max Aaron Caldwell PRT #85601C

2 messages

Barry, Anna <anna_barry@fws.gov> Thu, Dec 26, 2019 at 8:00 AM
To: Aaron Caldwell <a(b) (6)

Dear Mr. Caldwell,

I apologize for the delay in responding to your phone call. Please be aware that all applications for the import of an African elephant trophy are currently pending.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

---------- Forwarded message ---------
From: **Aaron Caldwell** < (b) (6)
Date: Mon, Jun 3, 2019 at 11:22 AM
Subject: [EXTERNAL] RE: Max Aaron Caldwell PRT #85601C
To: Barry, Anna <anna_barry@fws.gov>

(6)

Dear Ms. Barry,

Thank you for your feedback.

Hope you have a great summer and hope to hear a status change from you in the near future.

Please let me know if there is anything you need from me.

Have a great day!

Max Aaron Caldwell

(b) (6)

(b) (6)

Lincoln NE USA 68508

(b) (6)

From: Barry, Anna <anna_barry@fws.gov>
Sent: Monday, June 3, 2019 9:47 AM
To: Aaron Caldwell <(b) (6) >
Subject: Max Aaron

Dear Mr. Caldwell,

Currently all of the applications within our office for the import of a elephant trophy are pending.

Sincerely,

Anna Barry

Supervisory Policy Specialist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281

E-mail: Anna_Barry@fws.gov

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We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

---------- Forwarded message ---------
From: **Aaron Caldwell** <(b) (6)
Date: Thu, May 30, 2019 at 7:44 PM
Subject: [EXTERNAL] Max Aaron Caldwell PRT #85601C
To: Barry, Anna <anna_barry@fws.gov>

Dear Ms. Barry,

I hope all is well.

Do you happen to have any status update on my import permit?

Thank you very much for your time.

Your response is greatly appreciated.

Max Aaron Caldwell

(b) (6)

Lincoln NE USA 68508

(b) (6)

(b) (6)

Aaron Caldwell (b) (6) Thu, Dec 26, 2019 at 8:34 AM
To: "Barry, Anna" <anna_barry@fws.gov>

Dear Ms. Barry,

Thank you for the update.

I hope you and your family have a Happy New Year!

Aaron Caldwell
(b) (6)
(b) (6)
Lincoln NE USA 68508
(b) (6)

From: Barry, Anna <anna_barry@fws.gov>
Sent: Thursday, December 26, 2019 7:00 AM

To: Aaron Caldwell (b) (6)
Subject: Max Aaron Caldwell PRT #85601C

Dear Mr. Caldwell,

I apologize for the delay in responding to your phone call. Please be aware that all applications for the import of an African elephant trophy are currently pending.

Sincerely,

Anna Barry

Supervisory Policy Specialist

USFWS/Division of Management Authority

Branch of Permits, MS: IA

5275 Leesburg Pike

Falls Church, VA 22041-3803

1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281

E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

[Quoted text hidden]
[Quoted text hidden]
[Quoted text hidden]
[Quoted text hidden]
[Quoted text hidden]

[Quoted text hidden]

Error! Filename not specified.

OPERATOR ENHANCEMENT QUESTIONNAIRE

1. OPERATOR INFORMATION:

Name of Area Operator: **DAWID MULLER** (DAGGABOY HUNTING SAFARIS)

Years in business: **22 YEARS**

Name of Company conducting hunt: **CAPRIVI HUNTING CC**

Closest town to hunt location: **KATIMA MULILO** (ZAMBEZI REGION)

Country where hunt will take place: **NAMIBIA**

2. CONSERVANCY:

Name of Concervancy: **WUPARO CONSERVANCY**

Area in Km^2: **25,000HA**

Land tenure:

Government Lease ____ Community **X** Private Ranch ____ Private Conservancy

Length of Concession Agreement: **5 YEARS**

Can it be renewed? Yes **X** No ____

Length of Renewal, if applicable: **5 YEARS**

Estimated total amount received in trophy fees last year, if applicable: **N/A**

Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:

ALL OF THE ABOVE

Please provide the Conservancy location and nearest City:

120KM SOUTH WEST OF KATIMA MULILO (ZAMBEZI REGION) **- CLOSE TO SANGWALI VILLAGE**

Please attach a map or maps with the boundaries marked and showing the nearest City:

REFER TO THE "NAMIBIA - ZAMBEZI REGION MAP" ATTACHED

If the Conservancy borders a National Park, please provide Park name:

NKASA RUPARA AND MDUMU NATIONAL PARKS

Description of general and distinctive habitat features and any water features:

SWAMP LAND AND MOPANIE FOREST

3. Communities in the Conservancy:

Are there any communities living in the Conservancy? Yes **X** No

If so, estimated number of people or villages in the Conservancy? **3 Villages / ± 1,550 People**

Are there communities bordering this Conservancy? Yes **X** No

If so, estimated number of people or Villages around the Conservancy? **7 Villages / ± 3,500 People**

4. Relevant Game Populations in the Conservancy:[1]

Species name	Relative Abundance			Estimated Population	3-Year trend			How is it monitored?
	Dense	Avg.	Sparse		Up	Down	Stable	
Elephant	X			500 - 1,000			X	Game Scouts
Lion								
Leopard								
Prey species								

[1] The 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?"

5. Local Community Participation:

Total employment number: **9**

Please identify the number and type of all employees:

Employee Type	Total number of this type	Number of this type who are local/from nearby Communities
Professional Hunters	1	-
Trackers	2	2
Anti-Poaching Scouts / Rangers	* 12	* 12
Other Anti-Poaching	-	-
Cooks / Housekeepers	4 (2 Cooks / 2 Housekeepers)	3 (1 Cook / 2 Housekeepers)
Community Coordinators	* 1	* 1
Managers	* 2	* 1
Biologists	-	-
Other: Skinners	2	2

Note:

*** Anti-Poaching Scouts / Rangers**

Although they are paid by the Conservancy, money is generated directly by hunting and their salaries as such are paid for by Hunting.

*** Community Coordinators**

This function is done by our Camp Manager who is also one of the Trackers

*** Managers**

One Manager is also one of the Cooks & the other our Camp Manager

6. LOCAL COMMUNITY PARTICIPATION: [CONTINUATION]

Number of staff employed in the off-season: **ALL**

a. Please identify the number and type of staff that are engaged when the season is not open:

EMPLOYEE TYPE	TOTAL NUMBER OF THIS TYPE	NUMBER OF LOCALS / FROM NEARBY COMMUNITIES	WHEN EMPLOYED?
ANTI-POACHING STAFF	12	12	ALL YEAR
MANAGERS	2	1	ALL YEAR
MAINTENANCE	6	6	ALL YEAR
ROAD OPENING / CONSTRUCTION	VARIES	ALL	SEASONAL
COMMUNITY RELATIONS PERSONNEL	1	1	ALL YEAR

7. ANTI-POACHING EFFORTS:[2]

Number of Anti-Poaching staff: **12**

Are Anti-Poaching Patrols conducted during the hunting season, off-season, or both?

Hunting season: Off-season: Both seasons: **X**

Months during which Anti-Poaching Patrols are conducted: **ALL YEAR** (12 MONTHS)

Number of Anti-Poaching Patrols per month: **DAILY**

Description of Anti-Poaching equipment, vehicles, etc.:

TOYOTA HILUX DOUBLE CAB (SPONSORED BY CAPRIVI HUNTING CC)

[2] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

7. ANTI-POACHING EFFORTS: [CONTINUATION]

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution?

CONSERVANCY

Do you offer rewards to poaching informants leading to arrest? Yes **X** No

Do you offer rewards to poaching informants upon conviction? Yes **X** No

Please describe the company's anti-poaching expenditures below:

TYPE OF EXPENSE	SPENDING 2017	SPENDING 2018	SPENDING 2019	REMARKS
SALARIES FOR ANTI-POACHING SCOUTS / RANGERS	259,200	273,600	288,000	YEARLY SALARIES FOR 12 X RANGERS
EQUIPMENT	-	35,000	-	UNIFORMS+
VEHICLES	-	-	150,000	TOYOTA HILUX DOUBLE CAB
PETROL	-	-	-	
REWARDS PAID	-	-	-	
TOTALS	**259,200**	**308,600**	**438,000**	

What currency are the expenditures given in? **N$** (NAMIBIAN DOLLARS)

8. Anti-Poaching Results:

Category	2017	2018	2019	Remarks
Poaching Incidents Discovered	2	2	3	
Elephant Carcasses Observed	1	-	-	
Lion Carcasses Observed	-	-	-	
Leopard Carcasses Observed	-	-	-	
Ivory Poachers Arrested	-	-	-	
Meat Poachers Arrested	2	1	2	
Other Poachers Arrested	-	-	-	
Poachers Convicted	1	-	1	
Snares / Gin Traps Collected	-	-	-	
Firearms Confiscated	1	-	-	
Vehicles Confiscated	-	-	-	
Bicycles Confiscated	-	-	-	
Boats / Nets Confiscated	-	-	-	
Tusks Recovered	-	-	-	
Other: Fines Issued	1	1	1	Cash fines issued by Community for not so serious cases of Meat Poaching

9. COMMUNITY INVESTMENT:[3]

Does the Company contribute money or goods/services to local communities?

X Yes ____ No

If so, what percentage or amount is shared, how often, and why (e.g.: required by law, required by contract, voluntary contribution)?

VARIES - AS PER CONTRACT & VOLUNTARY CONTRIBUTION(S) MADE THROUGHOUT THE YEAR

Does the Company provide game meat to nearby communities? Yes **X** No ____

If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:

BETWEEN 12,000 AND 15,000KG WITH A VALUE OF ± N$ 350,000
THE MEAT OF ALL ANIMALS HUNTED WITHIN THE AREA, GOES TO THE COMMUNITY

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.

NORMAL PATROLS OF GAME SCOUTS AND HUNTING CREW APPLIES, UNLESS SUMMONED BY LOCALS FOR A SPECIFIC INCIDENT

Please describe any consolation payments made to local residents damaged by game species

LOSS OF COWS OR GOATS WILL BE PAID IF CARCASS CAN BE UTILISED FOR HUNTING
(E.G. USED FOR BAIT WHEN HUNTING CROCODILE)

What currency are the expenditures reported in? **N$** (NAMIBIAN DOLLARS)

SPECIES	DAMAGE CAUSED	CONSOLATION PAID 2017	CONSOLATION PAID 2018	CONSOLATION PAID 2019
ELEPHANT	CROP DAMAGE	-	118,000	PENDING
LION				
LEOPARD				
OTHER				

[3] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

9. COMMUNITY INVESTMENT: [CONTINUATION]

TYPE OF PROJECT	SPENDING 2017	SPENDING 2018	SPENDING 2019	REMARKS
EDUCATION *(E.G.: CLASSROOMS, OFFICES)*	-	-	500	SANGWALI KINDERGARDEN
EDUCATION *(E.G.: SCHOOL FEES, SCHOOL SUPPLIES)*	7,037	3,125	3,125	SCHOOL FEES DONATED, FIRST AID TRAINING & HUNTING GUIDE TRAINING
HEALTH *(E.G.: CLINICS, OFFICES)*	-	-	-	
HEALTH *(E.G.: MEDICAL SALARIES, EQUIPMENT)*	-	-	-	
COMMUNITY SCOUT SALARIES	12,000	15,000	18,000	YEARLY SALARY PAYMENTS
OTHER COMMUNITY ANTI-POACHING	30,000	-	25,000	SPONSORSHIP TO HUAP
LOCAL GOVERNMENT ACTIVITIES	-	-	33,417	ANIMALS TAKEN FOR MET AT THE SANGWALI FESTIVAL
WATER INFRASTRUCTURE IMPROVEMENTS	220,000	-	50,000	CONSTRUCTING COMMUNITY BOREHOLES / SOLAR PUMPS+
SPORTS TEAMS FUNDED	30,000	30,000	30,000	YEARLY SPONSORING OF SOCCER & NETBALL TOURNAMENT
CONSTRUCTION MATERIALS DONATED	78,750	50,000	75,000	SUPPORTING YEARLY COMMUNITY DEVELOPMENT
TOTALS	**377,787**	**98,125**	**235,042**	

Please describe any community projects paid for by the Company:

WE PAY FOR NUMEROUS COMMUNITY PROJECTS, STIPULATED AND AGREED UPON IN OUR 5 YEAR CONTRACT AS WELL AS REQUESTS RECEIVED THROUGHOUT THE YEAR FROM THE COMMUNITY, INCLUDING THE TRADITIONAL AUTHORITY (ELDERS) & WE TRY TO SUPPORT THEM WHERE WE CAN. WE ALSO MAKE MONTHLY CONTRIBUTIONS TOWARDS ANTI-POACHING & YEARLY CONTRIBUTION TOWARDS SPORTS TOURNAMENTS THAT WE HAVE DONE SINCE 2014. WE ALSO CONTINUOUSLY MAKE INFRASTRUCTURE IMPROVEMENTS WHERE NEEDED - ESPECIALLY WITH WATER, ABLUTION FACILITIES+

What currency are the expenditures reported in? **N$** (NAMIBIAN DOLLARS)

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	Hunting Elephant	Hunting Lion	Hunting Leopard	Hunting all Species
Number of U.S. clients	**2017:** 2	**2017:** N/A	**2017:** N/A	**2017:** N/A
	2018: 1	**2018:** N/A	**2018:** N/A	**2018:** N/A
	2019: 1	**2019:** N/A	**2019:** N/A	**2019:** N/A
Percentage of U.S. clients	**2017:** 100%	**2017:** N/A	**2017:** N/A	**2017:** N/A
	2018: 100%	**2018:** N/A	**2018:** N/A	**2018:** N/A
	2019: 100%	**2019:** N/A	**2019:** N/A	**2019:** N/A
Trophy fees paid by U.S. clients	**2017:** US$20,000	**2017:** N/A	**2017:** N/A	**2017:** N/A
	2018: US$20,000	**2018:** N/A	**2018:** N/A	**2018:** N/A
	2019: -	**2019:** N/A	**2019:** N/A	**2019:** N/A

11. Dollar amount and/or percentage of Company's revenue from U.S. Clients: $ **N/A**

12. OTHER INFORMATION:

Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies *(e.g.: ageing, size, resting areas)*, Concession Improvements *(e.g.: digging and maintaining boreholes, restocking)*, Management Activities, Research, etc.

HUNTING IN THE AREA IS VERY MUCH AIMED AT HARVESTING OLDER, POST BREEDING MALE ANIMALS. THIS MEANS THAT ANIMALS IN THEIR PRIME ARE GIVEN A CHANCE TO SPREAD THEIR GENES BEFORE THEY ARE HARVESTED.

THE QUOTAS FOR HUNTING SET BY THE GOVERNMENT ARE VERY CONSERVATIVE AND BASED ON A TAKE-OFF OF LESS THAN 3% OF THE POPULATION.

ACCESS TO WATER IS MONITORED THROUGHOUT THE YEAR TO MAKE SURE THAT ALL THE GAME ARE WITHIN EASY REACH OF WATER. THIS MEANS THAT WATER IS PUMPED IN THE AREAS WHERE THERE ARE NO ACCESS TO NATURAL WATER SOURCES.

PANTHERA HAS A FULL-TIME PRESENCE WITHIN THE AREA.

13. I declare that the foregoing is true and correct:

WUPARO CONSERVANCY	**TELEPHONE**	+264 61 234 328 / +264 81 128 1215
CONSERVANCY NAME	**EMAIL**	[redacted]
DAWID ANDREAS MULLER		OWNER
OPERATOR NAME		**TITLE**
[redacted]		www.daggaboy.com
		OPERATOR WEBSITE

.

[EXTERNAL] Max Aaron Caldwell PRT #85601C

(b) (6)

Mon 6/29/2020 2:44 PM

To: Barry, Anna <anna_barry@fws.gov>

2 attachments (483 KB)

Namibia - Zambezi Region Map.pdf; Operator Enhancement Questionnaire.pdf;

Dear Ms. Barry,

I hope all is well with you and your family during this time.

Please see attached.

This is from the Namibian operator of the area where I harvested my bull elephant in August 2016.

It is my understanding from SCI and others that the USF&W would like this form for each application.

I am not sure if this is correct or not but I wanted to pass along the information. I hope it is helpful and I hope this will help move my application forward.

If there is anything you need from me or anything else I can do please let me know. I will support you in any way possible.

Thank you for your time and your service. It is greatly appreciated!

Max Aaron Caldwell

(b) (6)

From: Barry, Anna <anna_barry@fws.gov>
Sent: Wednesday, April 8, 2020 6:54 PM
To: (b) (6)
Subject: Re: [EXTERNAL] RE: Max Aaron Caldwell PRT #85601C

Dear Mr. Caldwell,

We are currently set-up to accept application via e-mail, the e-mail you received was just notifying you of this new upgrade for our office. Since your application is currently pending in our office, there is no need for you to submit a new application.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976

Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

From: (b) (6)
Sent: Monday, April 6, 2020 3:30 PM
To: Barry, Anna <anna_barry@fws.gov>
Subject: [EXTERNAL] RE: Max Aaron Caldwell PRT #85601C

Dear Ms. Barry,

I all is well and you and your family are healthy during this very difficult time.

I received an email that there is a new process for applying for hunting import permits.

Since I applied more than 2 years ago do I need to do anything?

Thank you for your support and I look forward to your feedback.

Max Aaron Caldwell
+1.402.570.7523

From: Barry, Anna <anna_barry@fws.gov>
Sent: Thursday, December 26, 2019 7:00 AM
To: Aaron Caldwell (b) (6)
Subject: Max Aaron Caldwell PRT #85601C

Dear Mr. Caldwell,

I apologize for the delay in responding to your phone call. Please be aware that all applications for the import of an African elephant trophy are currently pending.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

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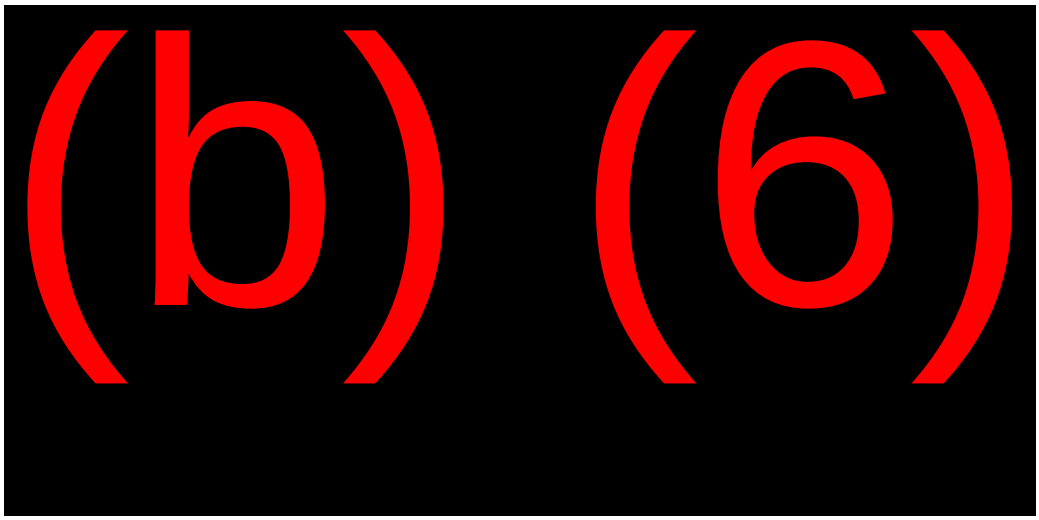
---------- Forwarded message ---------
From: **Aaron Caldwell** (b) (6)
Date: Mon, Jun 3, 2019 at 11:22 AM
Subject: [EXTERNAL] RE: Max Aaron Caldwell PRT #85601C
To: Barry, Anna <anna_barry@fws.gov>

Dear Ms. Barry,

Thank you for your feedback.

Hope you have a great summer and hope to hear a status change from you in the near future.

Please let me know if there is anything you need from me.



Sent: Monday, June 3, 2019 9:47 AM
To: Aaron Caldwell <(b) (6)
Subject: Max Aaron Caldwell PRT #85601C

Dear Mr. Caldwell,

Currently all of the applications within our office for the import of a elephant trophy are pending.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

---------- Forwarded message ---------
From: **Aaron Caldwell** <(b) (6)
Date: Thu, May 30, 2019 at 7:44 PM
Subject: [EXTERNAL] Max Aaron Caldwell PRT #85601C
To: Barry, Anna <anna_barry@fws.gov>

Dear Ms. Barry,

I hope all is well.

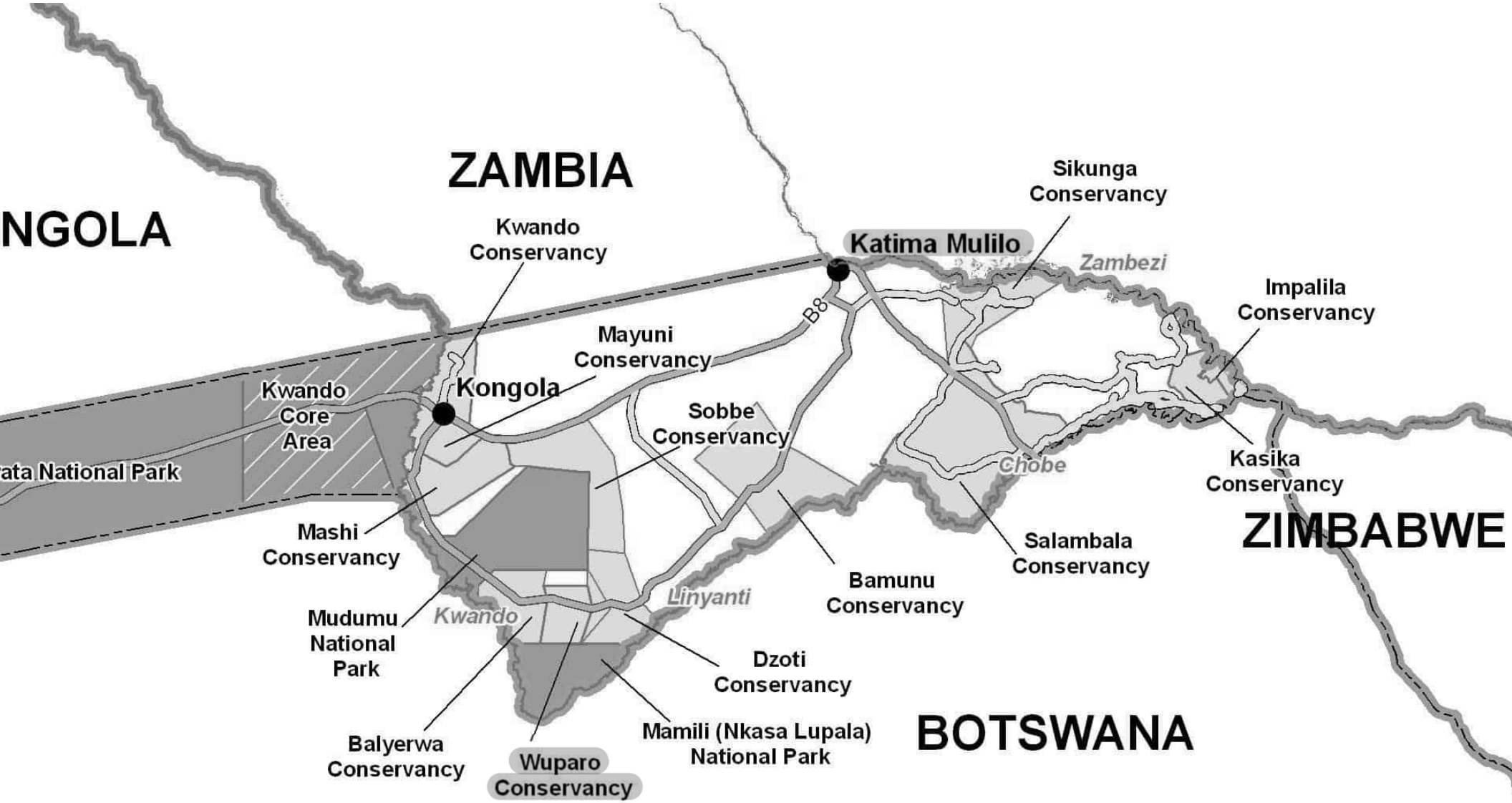
Do you happen to have any status update on my import permit?

Thank you very much for your time.

Your response is greatly appreciated.

Max Aaron Caldwell
(b) (6)

Error! Filename not specified.


ZAMBIA
NGOLA
Kwando Conservancy
Katima Mulilo
Sikunga Conservancy
Zambezi
Impalila Conservancy
B8
Mayuni Conservancy
Kongola
Kwando Core Area
ata National Park
Sobbe Conservancy
Chobe
Kasika Conservancy
ZIMBABWE
Mashi Conservancy
Salambala Conservancy
Linyanti
Bamunu Conservancy
Kwando
Mudumu National Park
Dzoti Conservancy
Mamili (Nkasa Lupala) National Park
BOTSWANA
Balyerwa Conservancy
Wuparo Conservancy

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD DEC 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: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Ghilarducci	Frank	W	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Sedalia	Colorado	80135	Douglas	U.S.A.

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 11-12-2018

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Frank W. Ghilarducci

(b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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, Chiredzi District, Masvingo Province,
Malpati Communal. GIS 298884 City - Cheredzi

   b. Date wildlife is to be hunted:

Oct 14, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Threeways Safari P.O. Box 110 Beitbridge Zimbabwe.
P.H. Barend Danial Marais Licence #570

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Zimbabwe Area - Malpati Communal.
GIS 298884

   b. Date wildlife was hunted:

Oct 14 2018

OMB Control No. 1018-0093
Expires 08/31/2020

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Threeways Safaris P.O Box 110 Beitbridge Zimbabwe
P.H. Barend Daniel Marais Licence # 570

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Threeways Safari P.O. Box 110 Beitbridge Zimbabwe.

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). See Attached.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Trophy Solutions Africa
Address: 11 6th Avenue Industria
City: Polokwane
State/Province: Limpopo
Country, Postal Code: South Africa 0699.

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Population Status Malpati Communal = 350

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

$20,000 U.S. Total.
$13,000 U.S went to the Communal + Tribal Lands

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b) (6) _____ Date: 11-12-2018

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 governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Subject: Re: paperwwork
From: Threeways Safaris (b) (6)
Date: 11/13/2018 3:08 AM
To: (b) (6)
CC: Fanie Steyn (b) (6)

Goodday

Please find below the requested information.

6a. Country- Zimbabwe
Region- Chiredzi District, Masvingo Province
Area- Malipati Communal
Hunting area-Malipati Communal
GIS coordinates- 298884
Nearest City- Chiredzi

6b. Date wildlife was hunted- 14 October 2018

6c. Name of hunting Outfitter- Threeways Safaris
Bubi River
Bothasrus Ranch
Post Office Box 110
Beitbridge
Zimbabwe

Name of Pofessional Hunter- Barend Daniel Marais
Licence number 570

6d. Threeways Safaris
Bubi River
Bothasrus Ranch
Post Office Box 110
Beitbridge
Zimbabwe

7. Please find attached below the special permit to remove this animal from the wild.

8. Threeways Safaris
Bubi River
Bothasrus Ranch
Post Office Box 110
Beitbridge
Zimbabwe

State: Beitbridge District
Province: Matabeleland South

9a) Population Status- 350 elephants

9b) Trophy fee is paid by the outfitter to Malipati Communal (Chiredzi Rural District Council) and used to benefit the community

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

MEMORANDUM

To: Director General

From: Area Manager HQ

Date: 1 October 2018

RE: AUTHORITY TO PROCESS SPECIAL PERMIT FOR HUNTING OUTSIDE PARKS ESTATE

Your authority is kindly sought to process the permit for Threeways Safaris who have applied for permit to hunt 1 x elephant with client Ghilarducci Frank William in the following properties:

- Malipati Communal in Chiredzi District Masvingo Province

The hunt will be **from 13 October 2018 to 20 October 2018** under the guidance of professional hunter Berend Marais PH license #570.

Kindly find attached application from the operator and copies of 2018 hunting permit and quota.

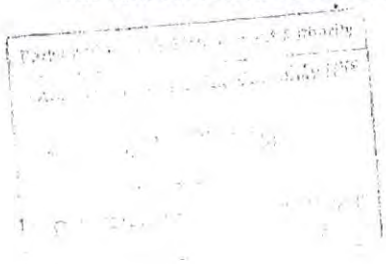
Recommended/ ~~Not Recommended~~..... 02/10/18

Investigation and Security Manager **Date**

Approved / ~~Not Approved~~..... 02/10/18

Head Management Services **Date**

For and on behalf of the Director General



Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD DEC 11 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
BURKE	ROBERT	LLOYD	

(b)(6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
HOUSTON	TEXAS	77030	HARRIS	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

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)

[signature] atty IN PACT 11/20/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   PRO CARGO USA — SELF ADDRESSED FED EX ENVELOPE ENCLOSED
   15619 MORALES ROAD — ATTN CINDI RULON
   HOUSTON, TEXAS 77032

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   CINDI RULON 281-220-3176 CINDI.RULON@PROCARGOUSA.COM

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      LOXODANTA 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 information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

      TIMBAVATI PRIVATE NATURE RESERVE MPUMALANGA DISTRICT NEAR HOEDSPRIT.

   b. Date wildlife was hunted:

      SEPTEMBER 24, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

PH H.P. du PLESSIS- INTREPID SAFARIS

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

SAFARY TAXIDERMY 47 GOUD STREET LABORIA POLOKWANE 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). ATTACHED

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	SAFARI TAXIDERMY
Address:	47 GOUD STREET
City:	LABORIA
State/Province:	POLOKWANE
Country, Postal Code:	REPUBLIC OF SOUTH AFRICA

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

WE UNDERSTAND THAT THE COUNTRY CENSUS FOR ELEPHANTS AND OTHER WILDLIFE HAS BEEN SUBMITTED TO USFWS DMA HEADQUARTERS. OUR UNDERSTANDING IS THIS SHOWS STABILITY AND GROWTH IN ELEPHANT POPULATIONS.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

MY HUNTING FEE WAS 55,000 US DOLLARS. A PORTION OF THESE FUNDS ARE USED TO FUND THE ANTI POACHING EFFORTS OF THE PRESERVE. 70% OF THE TIMBAVATI PRIVATE NATURE RESERVE IS FUNDED BY FUNDS COLLECTED FROM THE HUNTING COMMUNITY. ADDITIONAL LETTER ATTACHED.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

I PERSONALLY DONATED 3,000 US DOLLARS IN ADDITION TO THE FEES AND TIPS I PAID TO UPGRADE THE COMPUTER SYSTEM OF THE TIMBAVATI PRIVATE NATURE RESERVE. THIS WILL HELP TO IMPROVE THE PARKS DATA MANAGEMENT AND SUPERVISION OF THE ANTI POACHING ACTIVITIES.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: [signature] Date: 11/20/2018

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

ADDITIONAL INFORMATION FOR SECTION 9 FOR DR. ROBERT BURKE ELEPHANT APPLICATION

THE TIMAVATI RESERVE IS IN CHARGE OF BUTCHERING ELEPHANS AND THEY OVERSEE THE DISTRIBUTION OF MEAT TO THE VILLAGES. IT IS ESTIMATED THAT THE MEAT FROM THIS ONE ELEPHANT FEAD 75-100 FAMILIES IN THE LOCAL VILLAGES

ALL OF THE TROPHY FEES PAID GO TO FUNDING THE TIMAVATI PRIVATE NATURE RESERVE. 70% OF THE TROPHY FEE GOES TOWARD ANTI POACHING COSTS. THE FEES COLLECTED FROM THIS ELEPHANT HUNT PROVIDED THE EQUIVALENT OF TWO MONTHS BUDGET FOR THE RESERVE.

BECAUSE OF THIS AND OTHER HUNTS, THERE IS MONEY FOR ANTI POACHING PATROLS AND EQUIPMENT. THE OFFICERS HIRED BY THE RESERVE HAVE BEEN ABLE TO STOP PAOCHING THROUGH CONSTANT PATROLS IN THE RESERVE. DUE TO THESE PATROLS, THEY HAVE NOT HAD A POACHING INCIDENT ON ANY RHINOS OR ELEPHANTS FOR ONE YEAR.

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 68588

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 24 / 09 / 2018 Terminated 28 / 09 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
					X			

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: HP du Plessis
Business Address: PoBox 507
Alldays
Code: 0909
ID No: 760424 5095 080
PH Permit No: MTPA/PH/1929
Date: 28/9/2018 Signature:

CLIENT

Name: Robert Lloyd Burke
Permanent Postal Address: (b)(6)
Houston, Texas Code: 77062
Country: USA
Passport No: (b)(6)
Email:
Date: 28/9/2018 Sign: (b) (6)

HUNTING OUTFITTER

Name: HP du Plessis Intrepid Safaris
Business Address: PoBox 507
Alldays Code: 0909
I.D. No: 760424 5095 080
Tel No: 083 633 5197 Fax No:
HO Permit No: MTPA/HO/0871
Date: 28/9/2018 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
Timbavati Private Nature Reserve	Enhla-zeni	PR White Timbavati Private Nature Reserve	15225	24/9/18 to 28/9/18	Elephant	1		X	
					Giraffe.	1		X	

Address to which trophies are to be sent: Will advise
Code: Country: USA Trophy Export Date (Estimate):

Conservation Levy
Total:

Copies:

Client	Original	White	
	1st Copy	Pink	Forward to Nature Conservation Authority where hunt took place
Hunting Outfitter	2nd Copy	Blue	Retain for a period of three years
Taxidermist	3rd Copy	Green	Taxidermist
Professional Hunter	Last Copy	Yellow	Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more.

Permit No.: 15225

Mpumalanga
TOURISM AND PARKS AGENCY

PERMIT FOR THE HUNTING OF

(Issued in terms of the Provisions of the Nature Conservation Act 10 of 1998)

Date Stamp

★ ☒ SPECIALLY PROTECTED GAME
★ ☒ PROTECTED GAME
★ ☐ ORDINARY GAME DURING A PERIOD WHICH IS NOT AN OPEN SEASON
★ ☐ PROTECTED WILD ANIMALS
★ ☒ GAME IN NATURE RESERVE

★ *Mark the square as indicated in the authorisation of the Chief Executive Officer.*

Full Name: ROBERT CLOYD RAPER (# (b)(6) 4765700

and residential address of the holder of the permit: (b)(6) 77030 U.S.A.

Name of the owner of the land to be hunted on: PAUL WHITE (HOPE - PHILLIP DU PLESSIS)

PARTICULARS OF THE HUNT

Name of farm or nature reserve and district in which it is situated	Species, number and sex of game which may be hunted	Species, number and sex of game hunted and the time and date on which it was hunted
TIMBAVATI PVR	ONE (1) ECCPTAN 7 BULL	
HOCOSPECIAL	ONE (1) GIRAFFE BULL	

TO BE HUNTED IN ACCORDANCE WITH THE APNR HUNTING PROTOCOL AND APPROVED QUOTA

in the terms of and subject to the provisions of the Nature Conservation Act 10 of 1998, the holder of the permit is hereby authorised to hunt the species, number and sex of the game referred to in the second column of the particulars of the hunt on the farm or nature reserve referred to in the first column thereof during the period of validity of the permit, subject to the conditions of the permit.

PERIOD OF VALIDITY OF THE PERMIT

The permit shall be valid for the period 21/09/ 20 18

to 30/09/ 20 18

VEEARTSNYPERMIT WORD DOK BENODIG VIR VERVOER VAN LEWENDE WILD EN ROU VLEIS OF PRODUKTE. VETERINARY PERMIT IS ALSO REQUIRED FOR TRANSPORT OF LIVE GAME AND GAME MEAT OR PRODUCTS

Number and date of the authorisation of the Chief Executive Officer:

Permit / Licence Fees:

Received R 5560.00 + R100 ADMIN FEE Receipt No. E/7

Signature of the person authorised by the Chief Executive Officer to issue the Permit:

TO BE FORWARDED TO:
WILDLIFE PROTECTION SERVICES
Private Bag X11338, Nelspruit, 1200 • Tel +27 (0) 13 759 5300/1 • Fax +27 (0) 13 759 5490
SEE CONDITIONS & REQUIREMENTS ON REVERSE SIDE

28-28.

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

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.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b)(6)

Cell Phone (b)(6)

Email address: (b)(6)

x Individual

KNOW ALL MEN BY THESE PRESENTS: That x Robert L. Burke (Full Name of Person), residing at x (b)(6) hereby constitutes and appoints each of the following persons - John Rulon CHB

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, steed 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 merchandize 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 merchandize, to receive any merchandize 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 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 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 John Rulon CHB , who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

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

(Print name) x Robert L. Burke

has caused these presents to be sealed and signed:

(Signature) x Robert L. Burke

((Date) x 10/21/18

Intrepid Safaris Elephant Harvest meat

Cindi Rulon

From: Intrepid Safaris / Phillip du Pless (b) (6)
Sent: Wednesday, November 21, 2018 2:51 AM
To: Cindi Rulon
Subject: Ele pics
Attachments: IMG-20181121-WA0055.jpg; IMG-20181121-WA0054.jpg; IMG-20181121-WA0052.jpg; IMG-20181121-WA0053.jpg

All the meat of my elephants hunted in the Timbavati witch you have the managment plan of goes to e rehabelitaion centre called Mohololoholo. Every once of it. Here they are collecting it. I do not have pictures of all the recoveries just some.

TIMBAVATI PRIVATE NATURE RESERVE

ANNUAL AERIAL CENSUS REPORT

19 September 2018

Compiled by:

Almero Bosch (TPNR Ecologist)

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INTRODUCTION

1.1 PREAMBLE

The Timbavati Private Nature Reserve forms part of the Greater Kruger Park, and is a member of the Associated Private Nature Reserves otherwise known as the APNR. The Timbavati Private Nature Reserve, herein further referred to as the TPNR, describes its vision for the overall long-term goal for the operation, protection and development of TPNR as follows: *To provide for ecologically and aesthetically sustainable (non-consumptive and consumptive) use of the area for its owners, based on wildlife focused recreation, tourism and hunting.*

The purpose of an organisation is the foundation on which all future action is based and must be in line with the overall management philosophy of the association. The purpose of the TPNR is thus defined as follows: *To conserve and maintain important aquatic and terrestrial habitat for wildlife conservation, ecosystem services and geological features whilst providing opportunities and benefits for sustainable nature based tourism and hunting whilst ensuring continued community support and beneficiation.*

Responsible wildlife management practices necessitated the monitoring of wildlife populations, the TPNR thus participates in active population monitoring of all mammalian species including carnivores. The scope of this report is to summarise the results for the annual aerial census conducted during September 2018. Please note that this report only provides information on the annual aerial census and that reports on other species and census techniques are published separately.

1.2 SURVEY AREA

The Timbavati Private Nature Reserve encompasses a total area of 530.2 km^2, and is situated between: -24.190 and -24.198 S and 31.227 and 31.278 E. The reserve forms part of the Greater Kruger Park and is situated directly west of the Houtboschrand and Kingfisherspruit sections. The TPNR furthermore forms part of the Associated Private Nature Reserves, with the Umbabat and Klaserie Private Nature Reserves bordering towards the north and north-west respectively.

The TPNR falls within the Lowveld Bushveld climatic region of South Africa (Kruger 2004). Average rainfall for the area ranges from 500-700mm per annum (Kruger 2004), with the long

term average for the Timbavati Headquarters station in the region of 573 mm per annum. The peak rainfall season for the reserve is between the months of November and March, with the highest temperatures recorded during the months of January and February, this is further characterised by high humidity.

Geomorphology of the TPNR is characterised by an undulating landscape with small crests and long mid-slopes often not abrupt towards a foot slope or drainage line. High points within the landscape are confined towards the east of the TPNR, with the highest point located within the farm of Johnniesdale (520m m.s.l), followed by the Ceylon farm (420m m.s.l). Both of these properties can be located on the eastern boundary of the TPNR. Dolerite pipe erosion surfaces are prominent within the northern section of the TPNR and result in abrupt pedalogical differences.

Hydrology and drainage of the area consists of the Klaserie River, the only perennial river within the area, and eight other non-perennial rivers. Water for game is mainly in the form of earth dams build within drainage lines and pumped water in troughs, usually in the vicinity of infrastructure such as lodges and camps. The TPNR falls within the savanna biome with a further classification by Mucina and Rutherford (2006) at a vegetation unit scale, as part of the following vegetation units; Granite Lowveld (35018 ha), Phalaborwa-Timbavati Mopaneveld (18192 ha) and the Gabbro Grassy Bushveld (709 ha).

The main structural vegetation units within the TPNR can be described as:

- *Colophospermum mopane* veld within the north,
- Open *Senegalia nigrescens/ Sclerocarya birrea* veld with in the central sections, and
- Open *Combretum/ Terminalia* veld within the south.

A well-defined phyto-mass gradient is evident on the TPNR and this can be attributed to the rainfall gradient present, from the dry northern sections to the more mesic southern sections.

A wide verity of ungulates and the full spectrum of the large carnivores occur within the TPNR. Species dominating the landscape include, but are not restricted to: Impala (*Aepyceros melampus melampus*), African Elephant (*Loxodonta africana*), Cape buffalo (*Syncerus caffer*), Giraffe (*Giraffa camelopardalis*), Zebra (*Equus quagga*) and Blue wildebeest (*Connochaetes taurinus*). Primate species include: Chacma baboon (*Papio hamadryas ursinus*) and the Vervet Monkey (*Cercopithecus aethiops*)

Iconic carnivore species include; Lion (*Panthera leo*), Leopard (*Panthera pardus*), Cheetah (*Acinonyx jubatus*), Spotted Hyena (*Crocuta crocuta*) and both Black-backed jackal (*Canis mesomelas*) and Side-stripped jackal (*Canis adustus*). Furthermore, less frequent species within the Greater Kruger region, which might occasionally venture into the TPNR include: Eland (*Tragelaphus oryx*), Roan (*Hippotragus equinus*), Tsessebe (*Damaliscus lunatus*) and Sable (*Hippotragus niger*).

1.3 SURVEY METHOD

The Total Area Count (TAC) survey conducted between 8-10 September 2018 was based on the standard total count method (Norton-Griffiths, 1978). This technique, with a standardised helicopter and flight paths, has been used in conjunction with the Agricultural Research Council (ARC)[1] since 1991. Standardisation is vital for comparison of data over time, with special emphasis on open systems, with trends rather than actual numbers being analysed.

The total of 530.2 km^2 was surveyed, using a bell 206 B Jet Ranger helicopter, with count marker bars fitted to each side of the aircraft. Each marker bar represents a 200m transect on each side of the aircraft when the target height of between 70-90m is reached (Annexure 1). Fight paths are spaced 500m apart, resulting in a total survey strip length of 1566.5 km. Count session duration was limited to the fuel capacity of the aircraft and the sessions per survey day are depicted in (Annexure 1). The survey crew consisted of the pilot, Front Seat Observer (FSO) and two Rear Seat Observers (RSO). Navigation and data collection during the survey was done by means of the "Capture[2]" software program, a multi-disciplinary geo-referencing and data capture program.

All mammalian species encountered during the census were counted, these included all ungulates and carnivores. Other non-mammalian species counted during the survey included:

- Raptors nests,
- Saddle billed Storks,
- Southern-Ground Hornbill, and
- Vulture nests.

[1] Agricultural Research Council, Dr Mike Peel. Range and Forage Institute, Nelspruit.
[2] Capture software, Mike Pingo/ Sunrise Aviation, South Africa.

Weather conditions for the majority of the census period were favourable, with the exception of the last 15 minutes of the first session on 8 September 2018 when sporadic rainfall was experienced and due to the poor visibility, the helicopter was forced to land 15 minutes early, while the weather cleared. Specifics related to climatic conditions are depicted in (Annexure 1).

1.3.1 FIXED-WING-BUFFALO COUNTS.

Individual Cape buffalo and small bachelor herds were counted using the method described above, however in the case of a large herd, a fixed-wing aircraft was used to take high resolution photographs of the herd once encountered. This practise lends itself to more accurate counts and a realistic estimation of natality within these herds.

1.3.2 RHINOCEROS DEMOGRAPHICS

Photographs were taken of each rhinoceros, both black and white, encountered during the survey out of the helicopter. A photograph time and data record time was correlated to ensure all individuals on the photographs were accounted for. Ageing was done by utilizing the rhinoceros ageing guide of Adcock and Emslie (IUCN Publication)[3]. Due to the sensitive nature of this data set, rhinoceros demographics will only be used for specialist reports and not be distributed.

[3] Adcock and Emslie, African Rhino Monitoring Guide/ IUCN, Rhino Specialist Group

RESULTS

2.1 COUNT TOTALS

Results for species of importance are given in (Table 1). Impala (8233), Cape buffalo (1619), Burchell's zebra (856) African elephant (768) and blue wildebeest (635) were the most numerous species counted during the survey. Nyala (24) and bushbuck (2) numbers are low due to habitat selection of these cryptic species (riverine vegetation), and as a result these numbers cannot be seen as a true reflection.

A single Sable antelope bull was also recorded; this animal was seen at the pan close to Mopani camp on the farm Ceylon. Other species seen during the survey are depicted in (Table 2) with the following species counted within the Ngala concession area, warthog (2), impala (33), African elephant (3) and steenbok (1).

Table 1 Important species results (2018 TPNR aerial census).

Species	Count
Blue Wildebeest	635
Cape Buffalo	1619
Duiker	31
African Elephant	768
Giraffe	309
Hippopotamus	103
Impala	8322
Kudu	448
Nyala	24
Black Rhinoceros	** Not disclosed for security reasons*
White Rhinoceros	** Not disclosed for security reasons*
Steenbok	47
Vulture Nest	72
Warthog	196
Waterbuck	282
Burchell's Zebra	856

Table 2 Other species counted during the census.

Species	Count
Black-backed Jackal	3
Cheetah	1
Honey Badger	5
Leopard	2
Lion	16
Ostrich	1
Raptors nest	7
Southern Ground-Hornbill	38
Spotted Hyena	26
Vulture nest	72

2.2 IMPORTANT SPECIES DENSITY AND DISTRIBUTION

The overall animal density of all species counted during the survey was 28.3 animals/km^2. Densities of all important species as depicted in (Table 1) are at 26.2 animals/km^2. Density figures for individually important species are depicted in (Table 3). Important distribution notes are the increase of both Vulture nests and Impala within the north of the TPNR as well as the occurrence of African elephant and Kudu in close proximity to drainage lines. The distribution maps of all significant species within the TPNR are depicted in (Annexures 2 to12).

Table 3 Densities of important species counted during the 2018 Aerial census

Species	Density (no/km^2)
Blue wildebeest	1.20
Cape Buffalo	3.05
Duiker	0.06
African Elephant	1.45
Giraffe	0.58
Hippopotamus	0.19
Impala	15.70
Kudu	0.85
Nyala	0.05
Steenbok	0.09
Vulture Nest	0.14
Warthog	0.37
Waterbuck	0.53
Burchell's Zebra	1.62

2.3 BIOMASS

Total animal biomass for important species over the total survey area was 6381 kg/km^2 (Table 4), using biomass conversions according to Meissner *et.al.,*(1983). African elephant was the single highest contributor to animal biomass with 39% of the biomass assigned to this species followed by Cape buffalo at 27.5%. Other species with high contributions to total animal biomass were impala (9.9%), white rhinoceros (7.7%), giraffe (6.9%) and Burchell's zebra (5.1%).

Table 4 Biomass of important species during the 2018 Aerial census

Species	Biomass kg/km^2	% of Total biomass
Blue Wildebeest	147.37	2.33
Cape Buffalo	1374.62	21.75
Duiker	0.58	0.01
African Elephant	2499.62	39.56
Giraffe	437.26	6.92
Hippopotamus	194.34	3.08
Impala	628.08	9.94
Kudu	114.96	1.82
Nyala	3.31	0.05
Black Rhinoceros	6.16	0.10
White Rhinoceros	486.79	7.70
Steenbok	0.80	0.01
Vulture Nest	0.00	0.00
Warthog	16.64	0.26
Waterbuck	85.13	1.35
Burchell's Zebra	323.02	5.11

Biomass interpretation can be done by grouping the important species into the following broad classes representing feeding habits; Pachyderms, including buffalo, Grazers, Browsers and Intermediate feeders. It is important to note that these broad feeding classes and respective biomass will directly indicate the competition for herbaceous and woody resources on the TPNR.

A comparison between the 2017 and 2018 aerial census results is made in terms of average biomass/ broad feeding class (Figure 1). It is important to note both Cape buffalo and African elephant numbers are higher in the 2018 census. Densities and biomass of species grouped into these broad feeding classes are depicted in (Figures 2 to 4), based on the 2018 census results. Figures 5 to 8 further refer to the trends in herbivore feeding classes, i.e. feeding class 1 to feeding class 4.

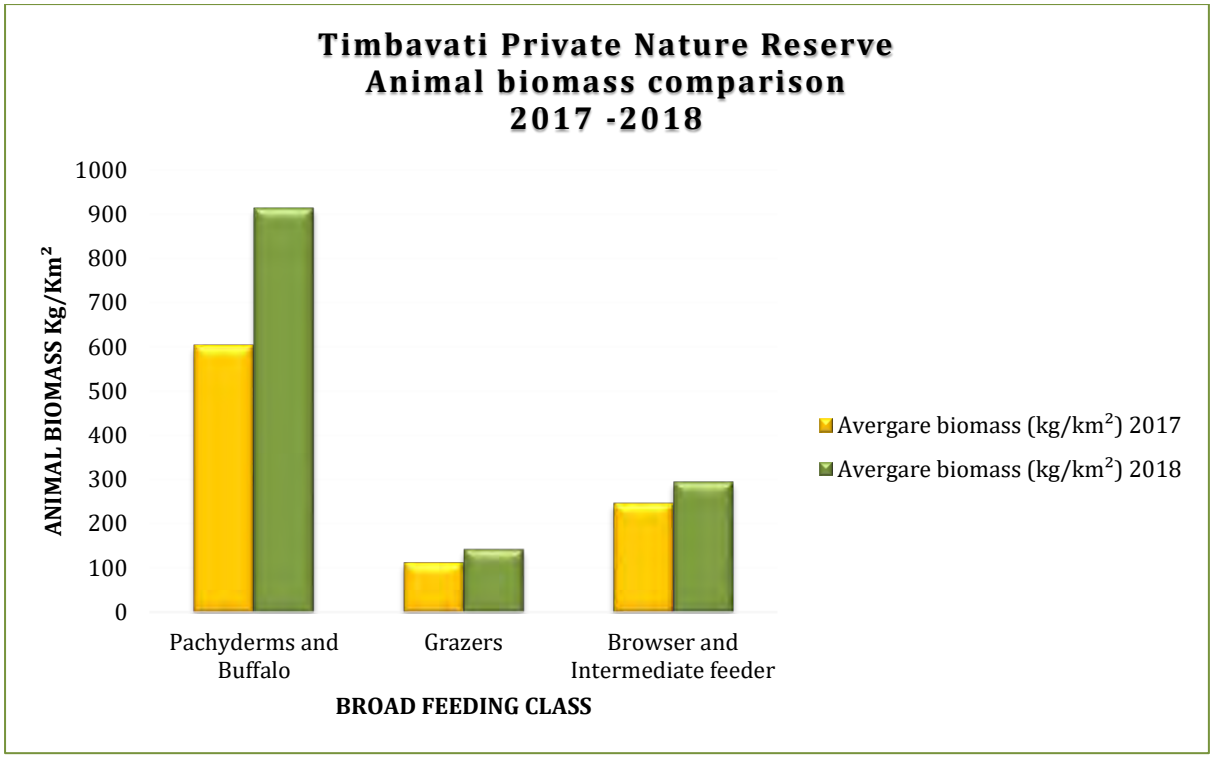


Figure 1 Biomass comparison between 2017 and 2018 for respective broad feeding classes, September 2018.

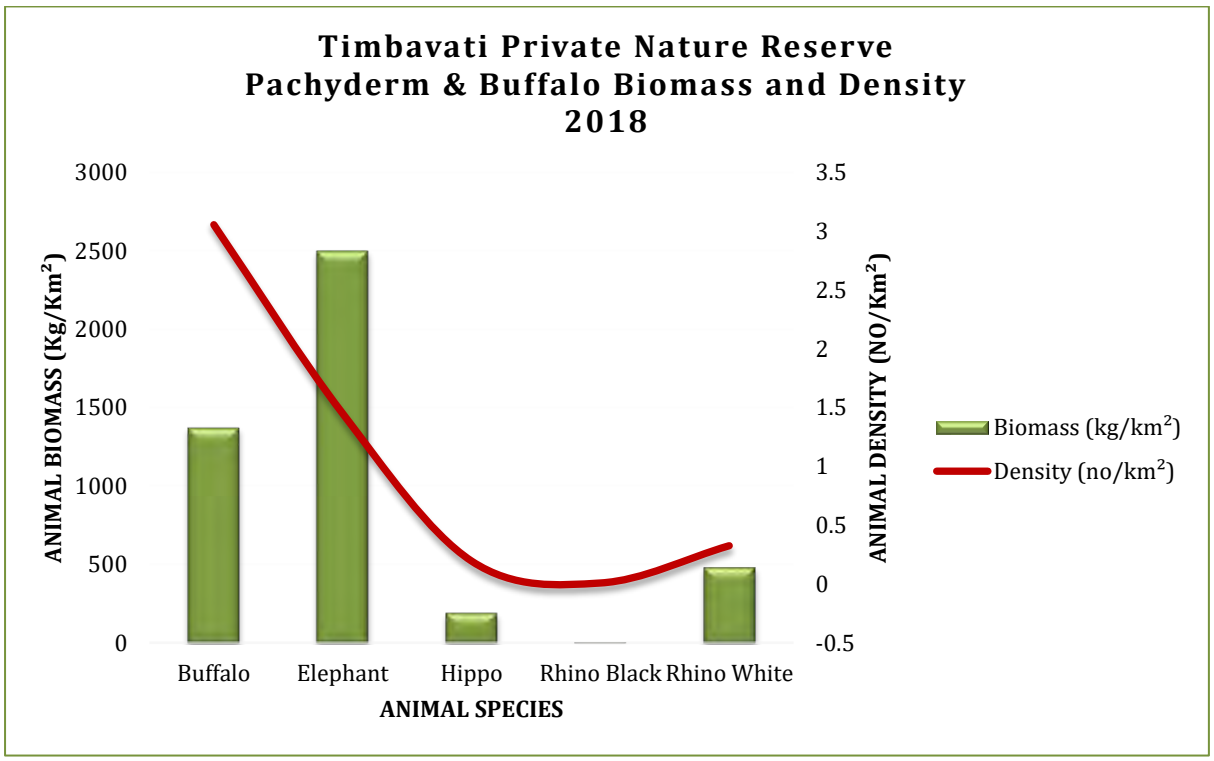


Figure 2 Biomass and density for Pachyderms and buffalo as a broad feeding class, September 2018.

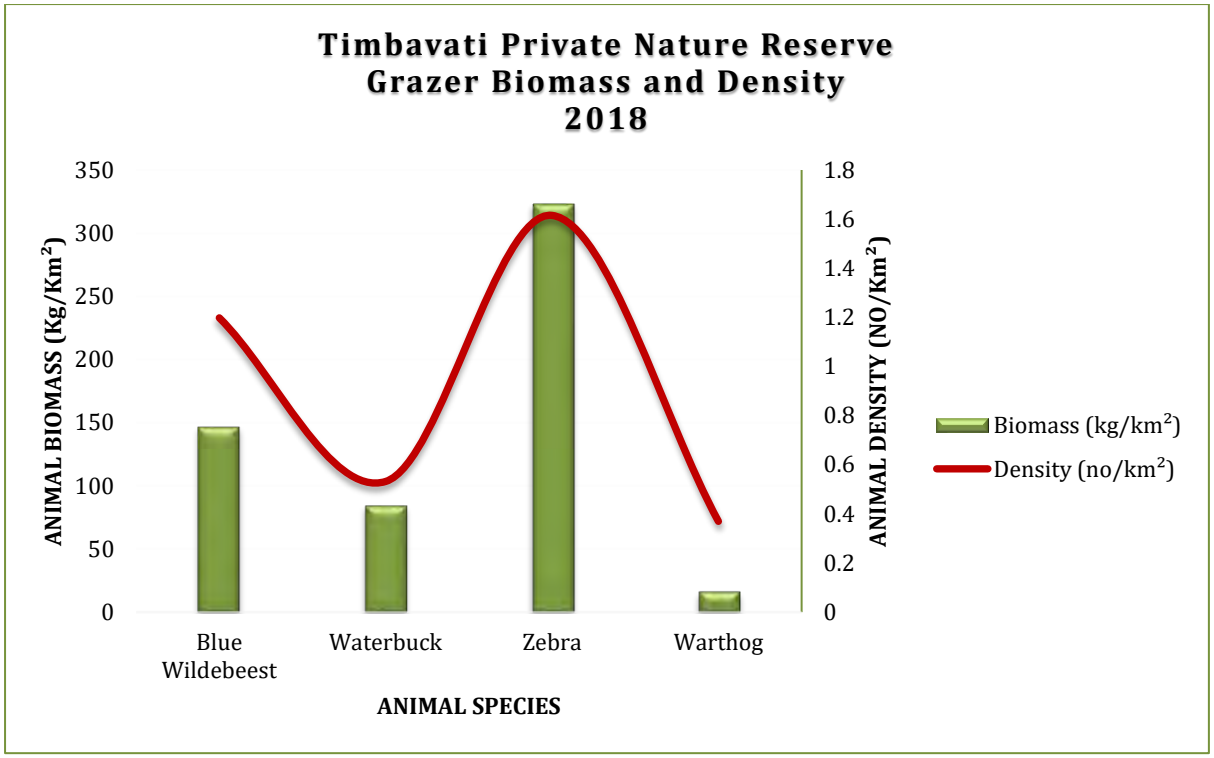


Figure 3 Biomass and density for grazers, September 2018.

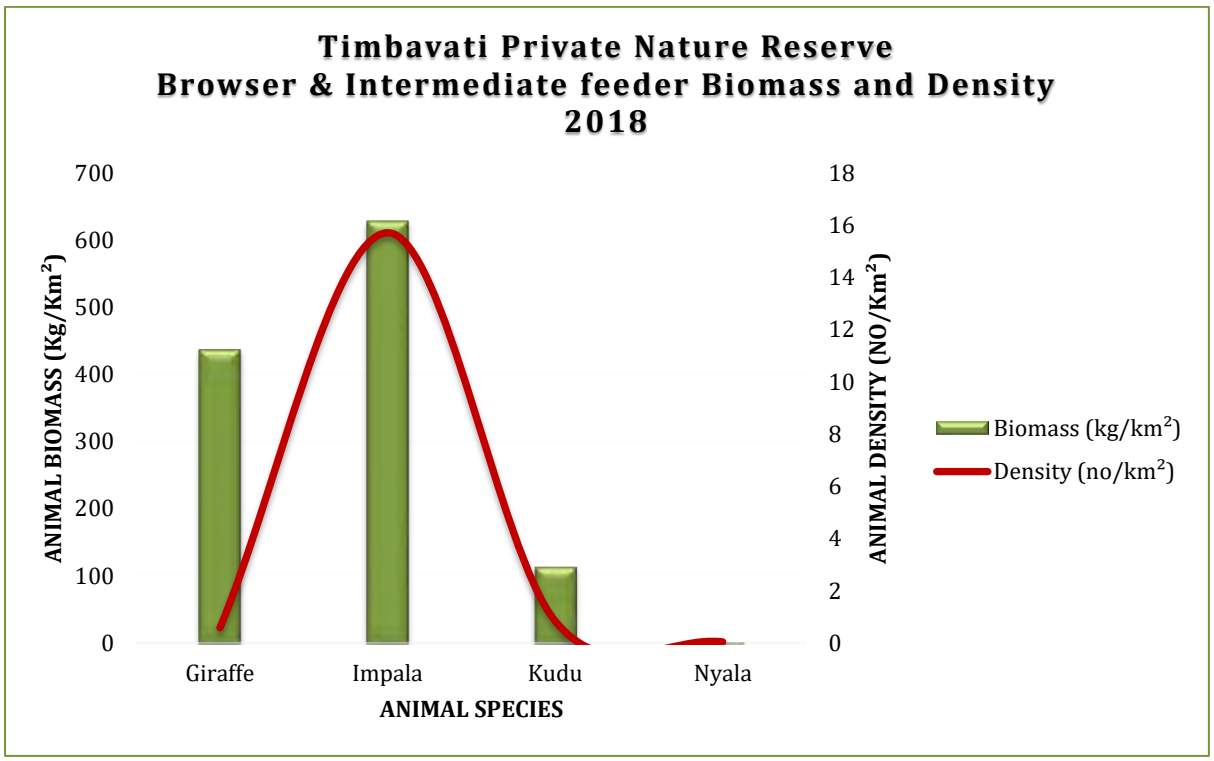


Figure 4 Biomass and density for browser and intermediate feeders, September 2018.

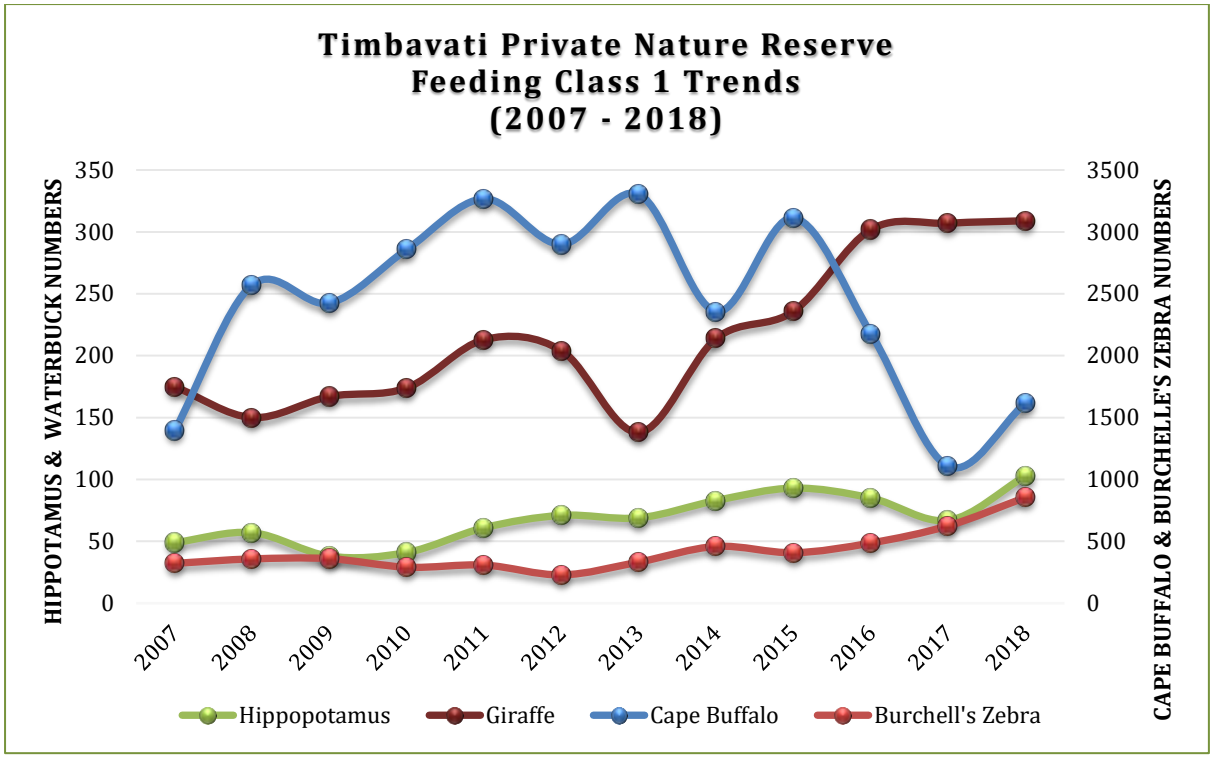


Figure 5 Graph illustrating the feeding class 1 species trends within the Timbavati Private Nature Reserve, 2007 – 2018.

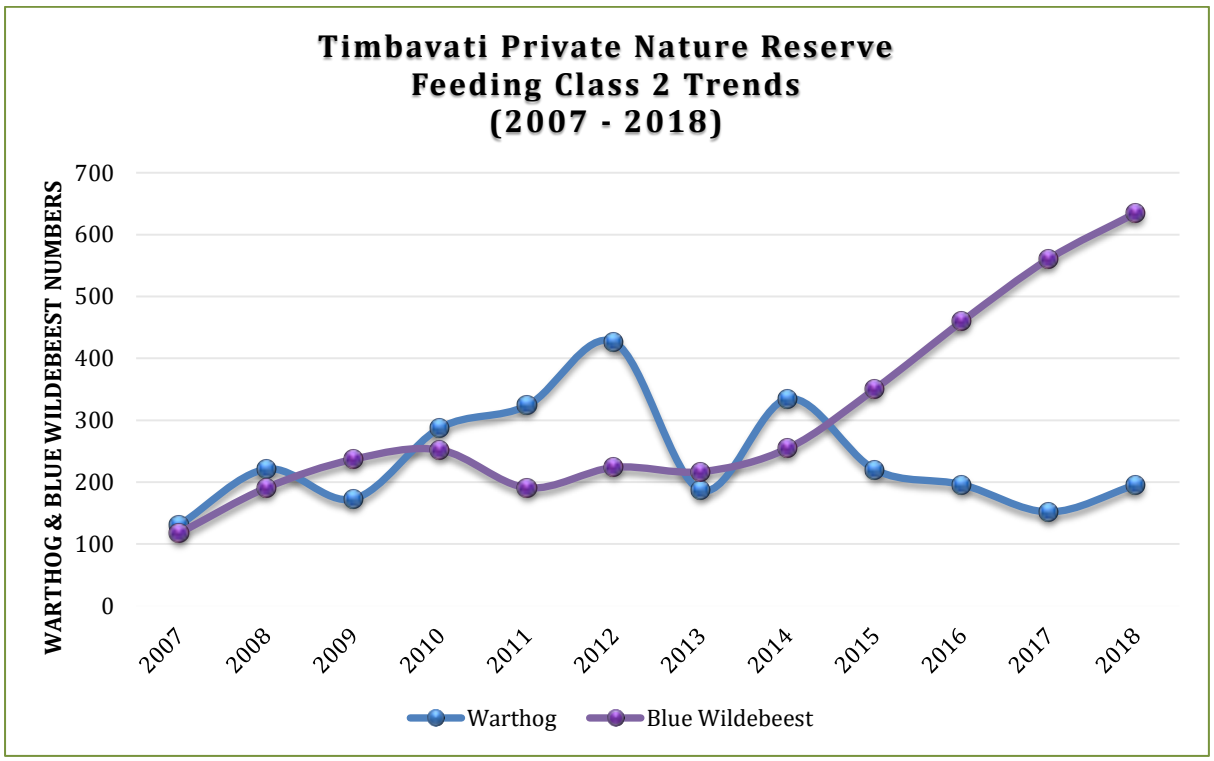


Figure 6 Graph illustrating the feeding class 2 species trends within the Timbavati Private Nature Reserve, 2007 – 2018.

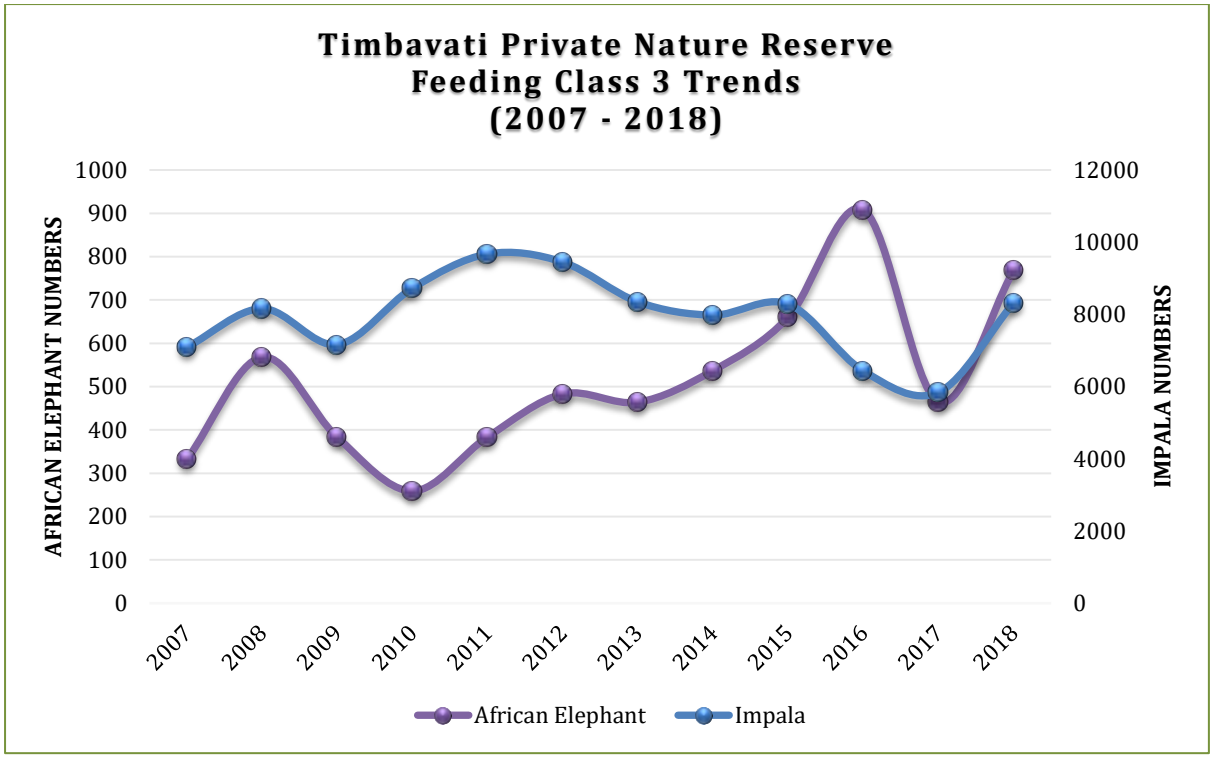


Figure 7 Graph illustrating the feeding class 3 species trends within the Timbavati Private Nature Reserve, 2007 – 2018.

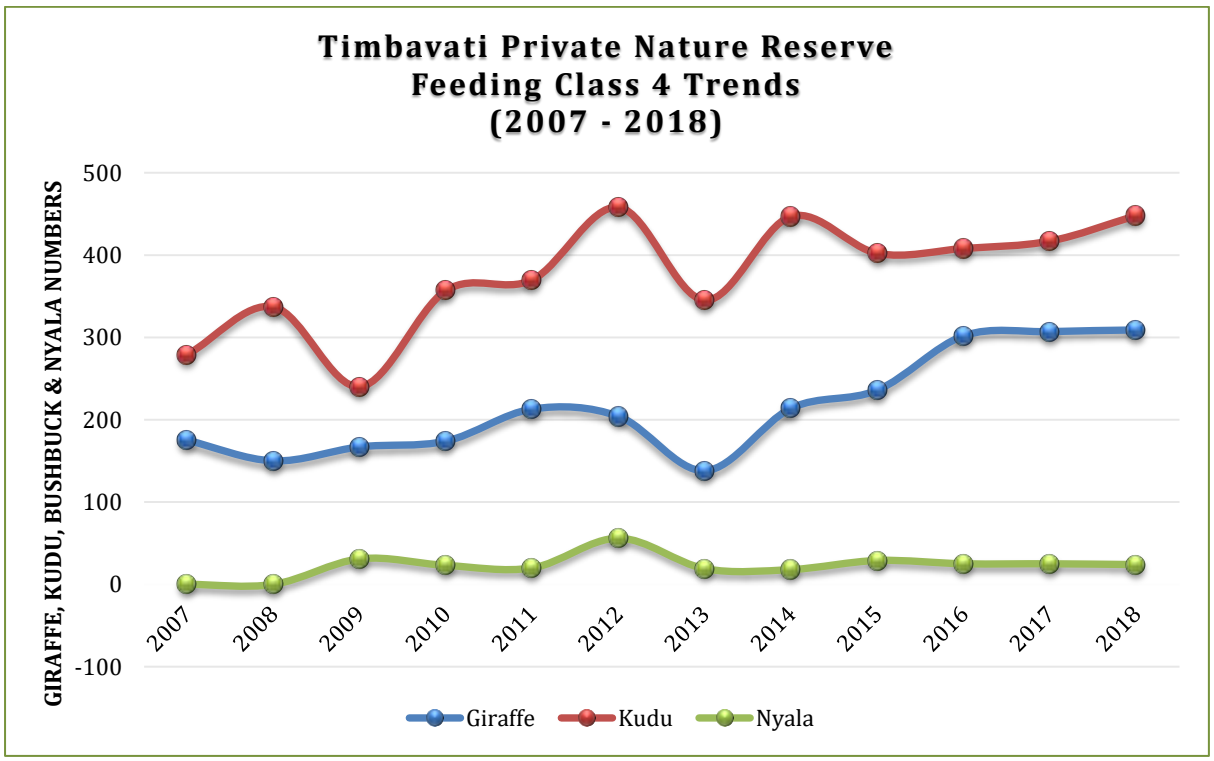


Figure 8 Graph illustrating the feeding class 4 species trends within the Timbavati Private Nature Reserve, 2007 – 2018.

METHOD OF ASSESSMENT

Population numbers as recorded during the 2018 census in general is satisfying if compared to the long term data set (Bosch, 2009). Climatic conditions prevailing from 2015-2017 have negatively influenced population numbers to a varying extend. Populations have shown positive growth according to the 2018 results.

Antelope species such as Nyala, Duiker and Steenbok are difficult to count during aerial surveys due to their cryptic colouration, habitat, size and behaviour if disturbed. These species numbers are given for reference purposes only.

3.1 POPULATION GROWTH

3.1.1 BLACK RHINOCEROS

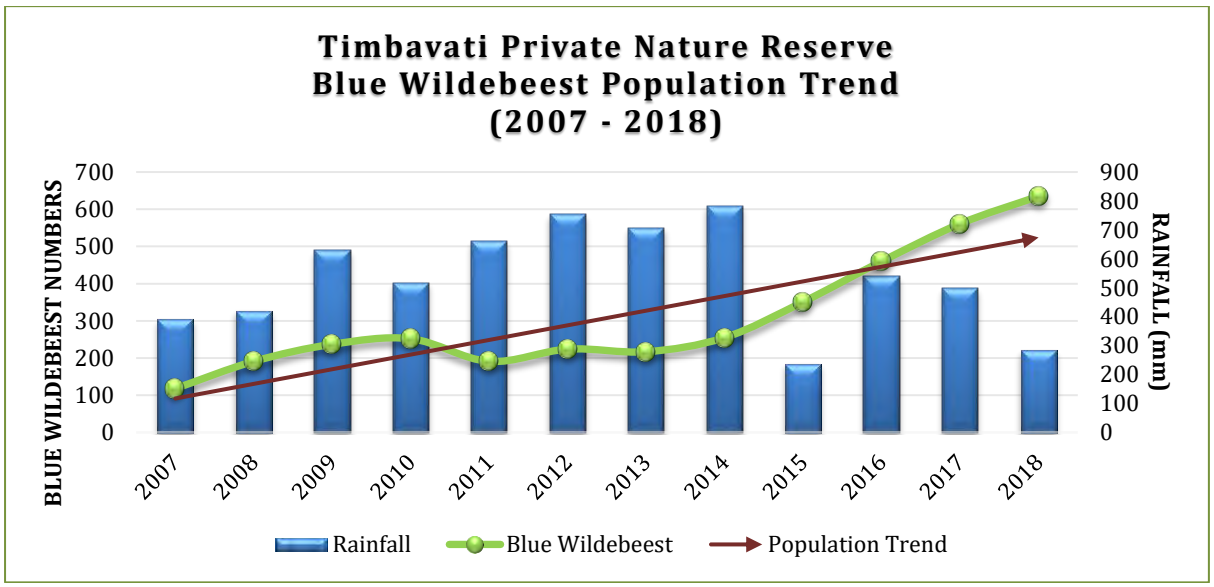
This species have shown a decrease of 20% during the 2018 census. The species is known to have an erratic growth figure within the TPNR. This is mainly due to the movement of only a few individuals within 15% of the TPNR. This species is highly selective in terms of habitat and are also known to be explorative. With the incorporation of Thorny Bush Game Reserve (TBGR) as part of the APNR, new habitat for exploration was opened; movement between the TPNR, Kruger Park and TBGR is inevitable.

3.1.2 WHITE RHINOCEROS

White Rhinoceros have shown an increase of 14% during the 2018 census. Numbers for this species are stable in relation to the long term dataset. A total of 31 calves (0-1,5years of age) were counted during the 2018 census.

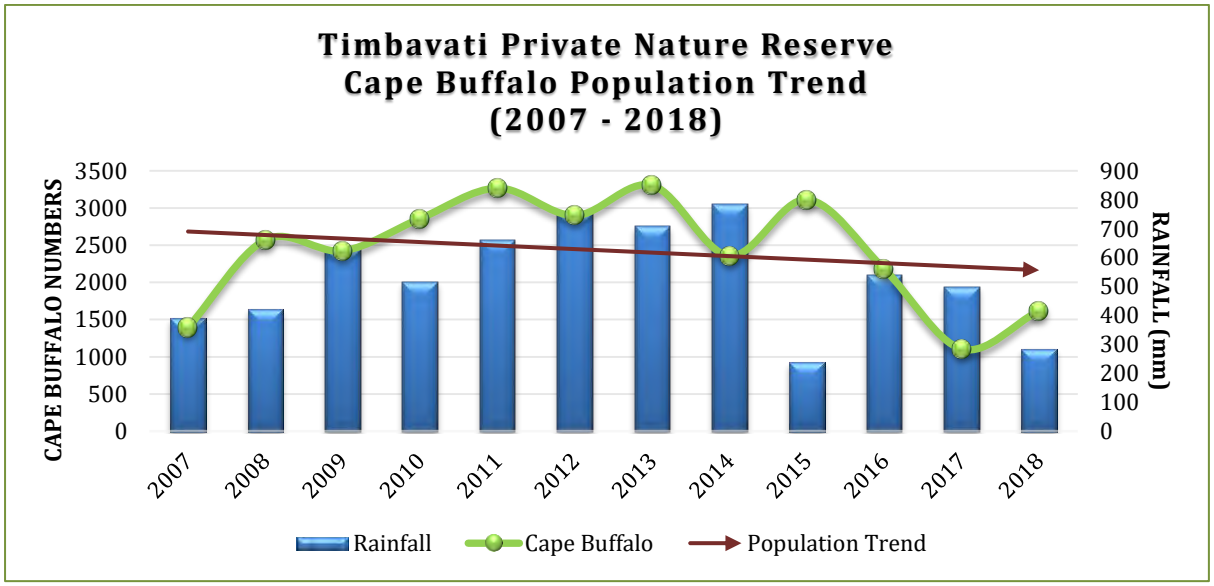
3.1.3 BLUE WILDEBEEST

This ungulate species have shown a 13% increase during the 2018 census. Blue wildebeest have also shown a drastic increase in numbers from 2010 (252) to 2018 (635), incorporation and water policies can be ascribed to this increase in numbers over years.



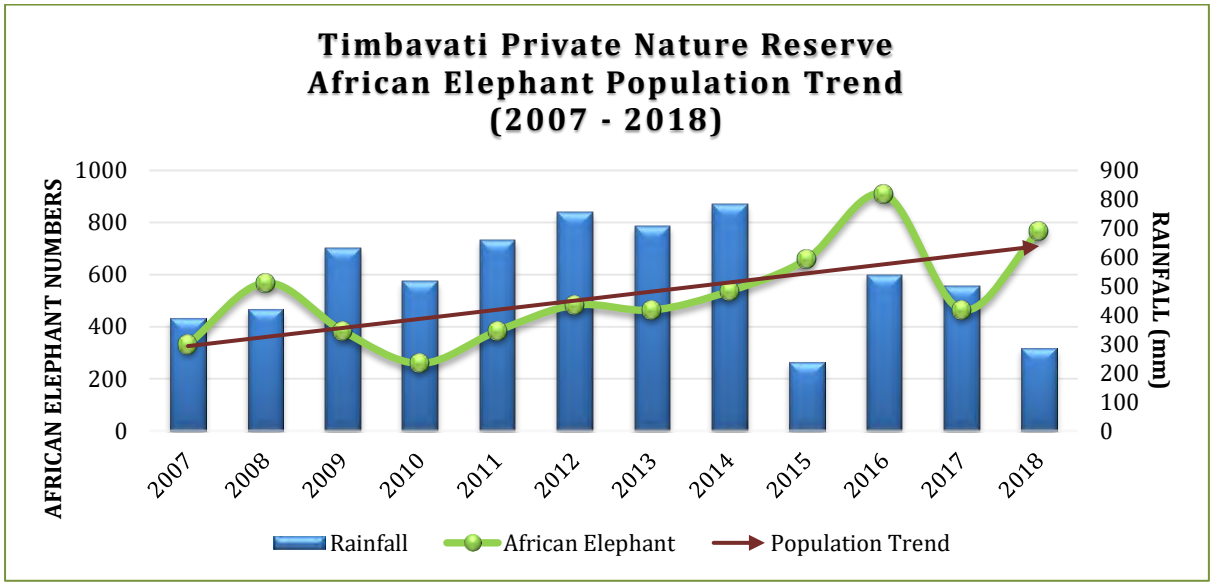
3.1.4 CAPE BUFFALO

Cape buffalo numbers are increasing slowly after the drought period with a 46% increase during the 2018 census. Buffalo herds are becoming larger and more frequently seen on the reserve. The count of 1619 is still low in relation of the long term dataset average of 2400-2500 individuals for the TPNR management area.



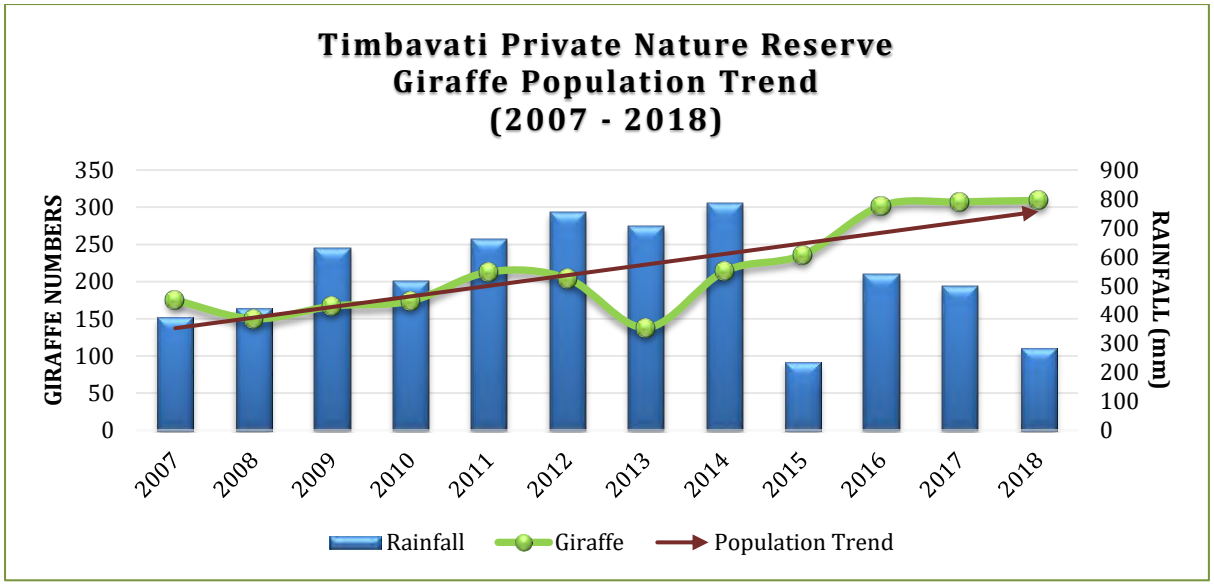
3.1.5 AFRICAN ELEPHANT

This species showed a 65% increase during the 2018 census. Elephant is the species with the highest percentage increase during the 2018 census. This species contributes the most (39%) to overall animal biomass on the TPNR, the constant increase of this species can be ascribed to water policies.



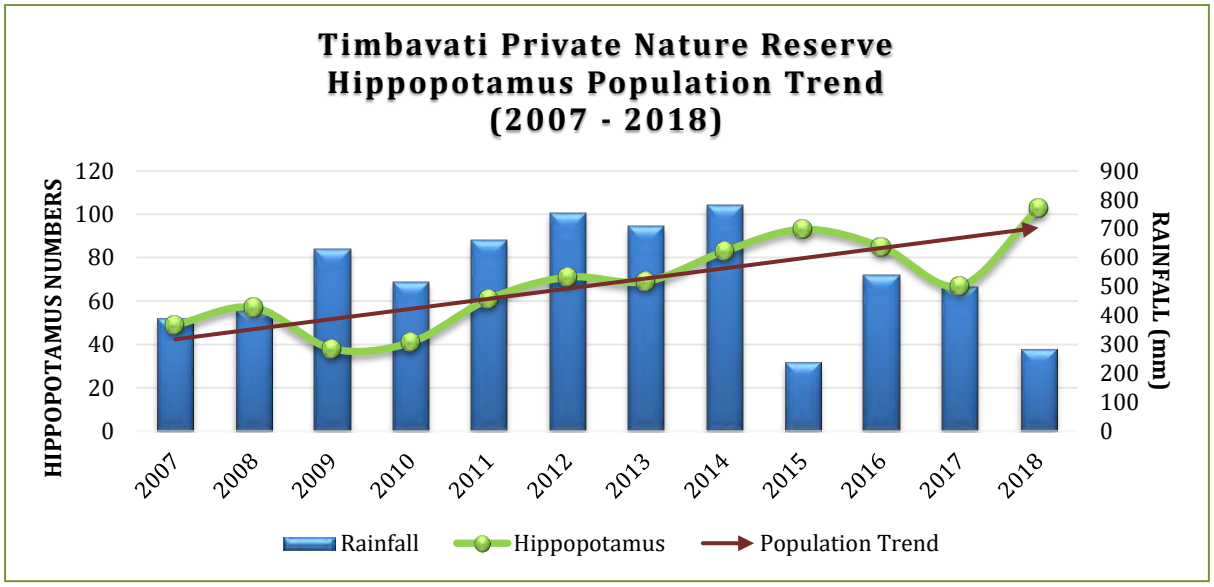
3.1.6 GIRAFFE

This species have shown a 0.7% increase during the 2018 census. The population is stable with little variation as from the 2016 census.



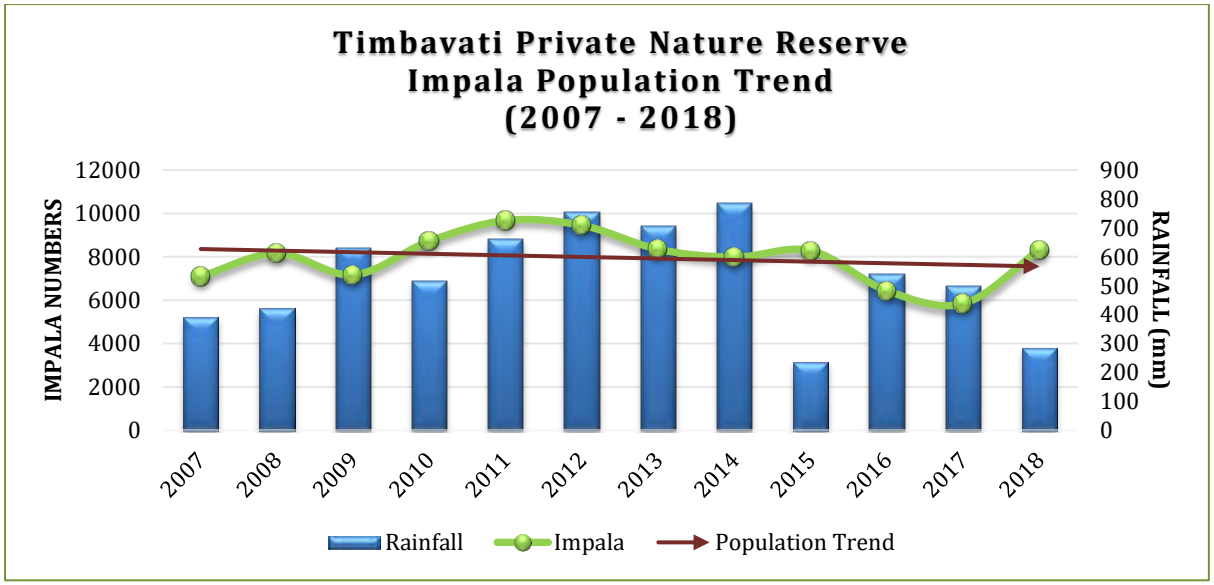
3.1.7 HIPPOPOTAMUS

This species have increased by 54% from the 2017 census. The TPNR hippopotamus population has always been stable with the exception of the 2015 count when habitat conditions during the drought influenced the population negatively.



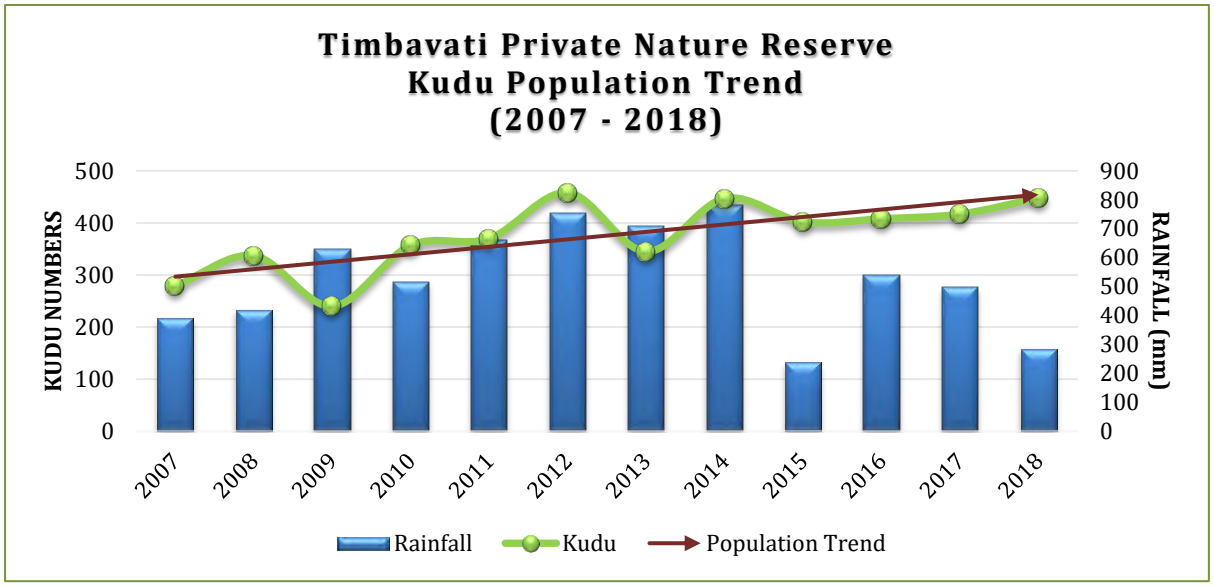
3.1.8 IMPALA

Impala, second to elephant, have the highest percentage increase (42%) during the 2018 census. This species count has always been the highest of all ungulates on the TPNR with fluctuations between years. The increase of this species in particular can be ascribed to water policies.



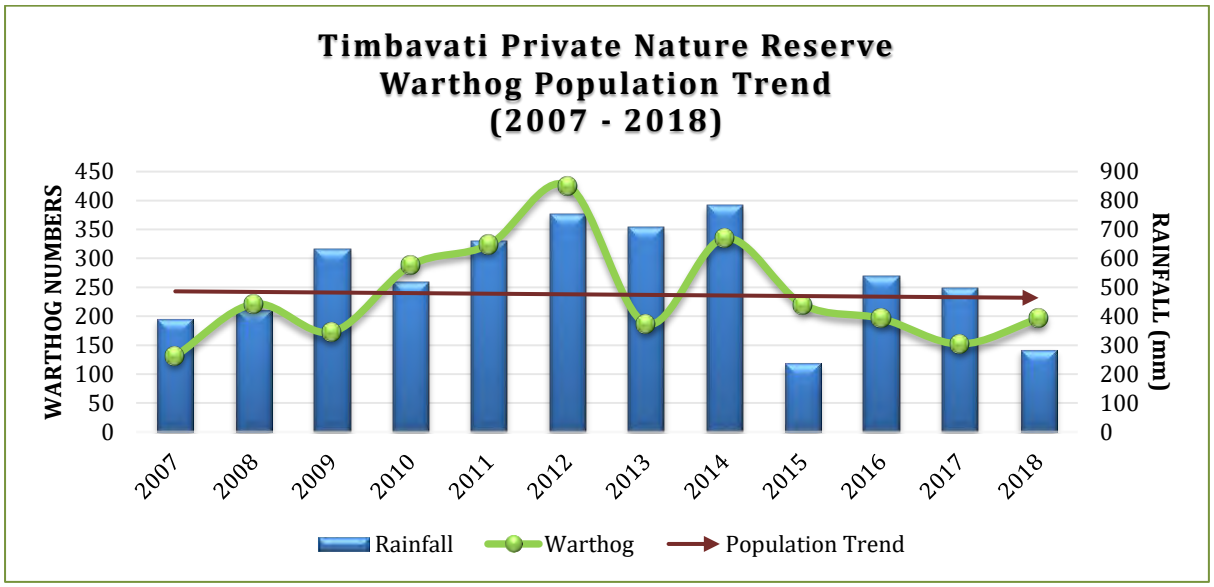
3.1.9 KUDU

Kudu numbers have increased with 7%. This is a welcoming increase as the population showed a decline of 10% during the 2015 census, with a recovery of 1.4% and 2.2% during 2016 and 2017 respectively. The population remains stable.



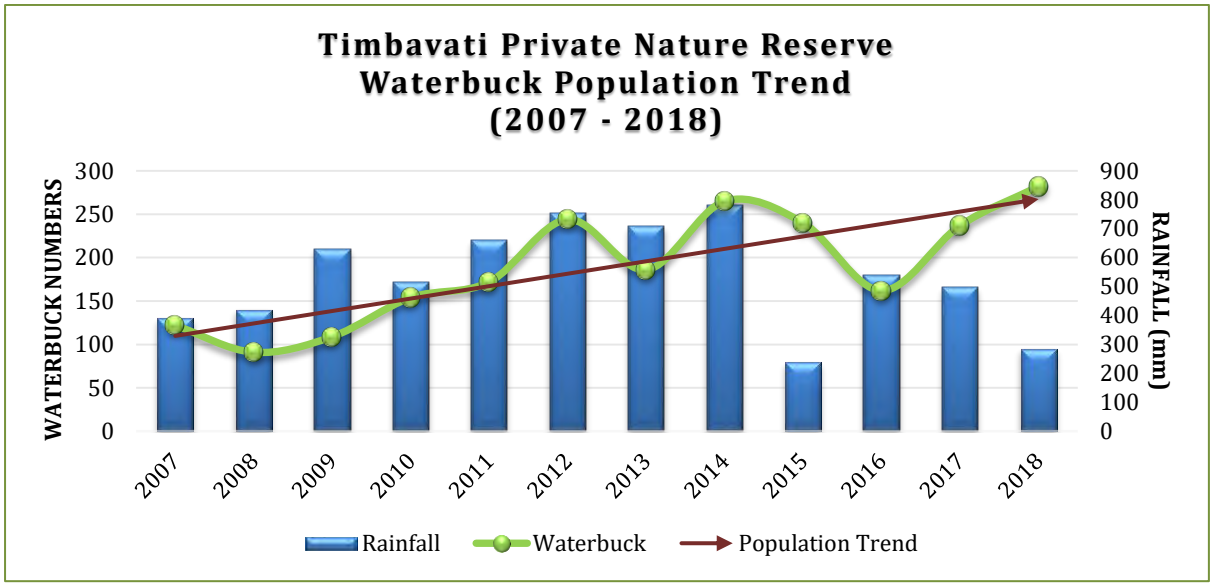
3.1.10 WARTHOG

Warthog numbers have increased by 29% during the 2018 census, the second highest increase after the 2010 increase of 66%. This increase might be short term as this species is known to increase drastically when conditions are favourable after a drought. The population is expected to stabilise when we enter a normal rainfall cycle.



3.1.11 WATERBUCK

This species increased by 19% during the 2018 census. This increase is welcoming as the species have shown a combined 41% decrease for the years 2015-2016. The waterbuck population is stable with climatic factors influencing the decline over the 2015-2016 periods.



3.1.12 BURCHELL'S ZEBRA

This species increased by 37% during the 2018 census. Zebra numbers have started to increase as from 2013 with the exception of 2015 when results showed an 11.1% decrease. The population is stable and with the incorporation of TBGR to the APNR, structural habitat attributes brought about by fire and Elephant impact can be seen as the main drivers of population increase for this species.

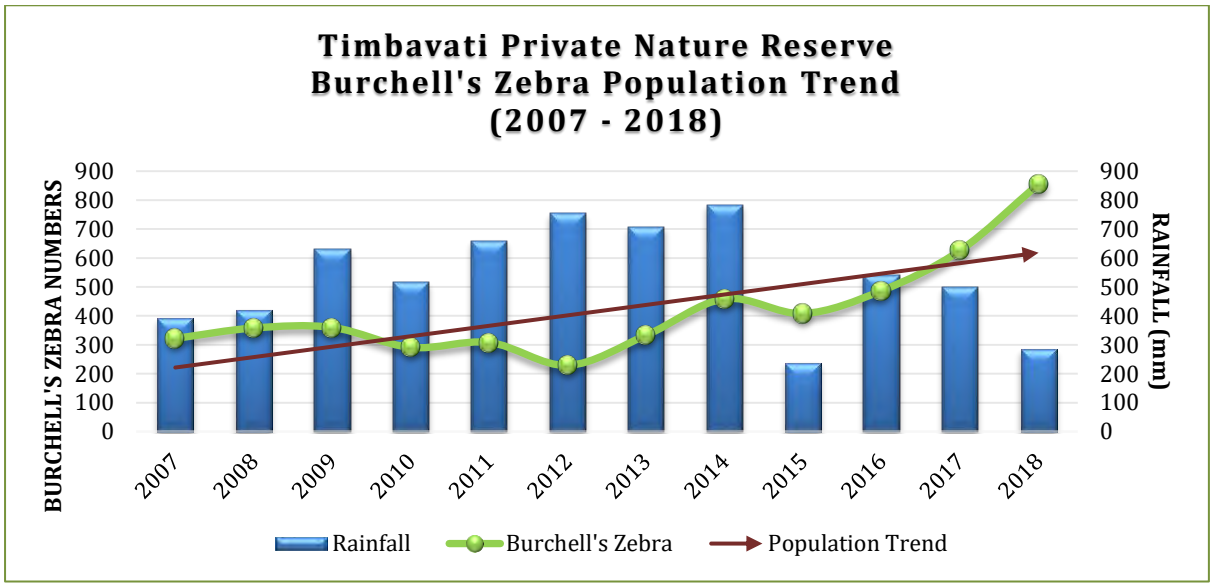


Table 5 Biomass of important species during the 2018 Aerial census

Species	2018	2017	Variance	%Variance
African Elephant	768	465	303	65.2%
Black Rhinoceros	** Removed for security reasons*			-20.0%
Blue Wildebeest	635	561	74	13.2%
Burchell's Zebra	856	626	230	36.7%
Cape Buffalo	1619	1106	513	46.4%
Giraffe	309	307	2	0.7%
Hippopotamus	103	67	36	53.7%
Impala	8322	5844	2478	42.4%
Kudu	448	417	31	7.4%
Warthog	196	152	44	28.9%
Waterbuck	282	237	45	19.0%
White Rhinoceros	** Removed for security reasons*			13.9%

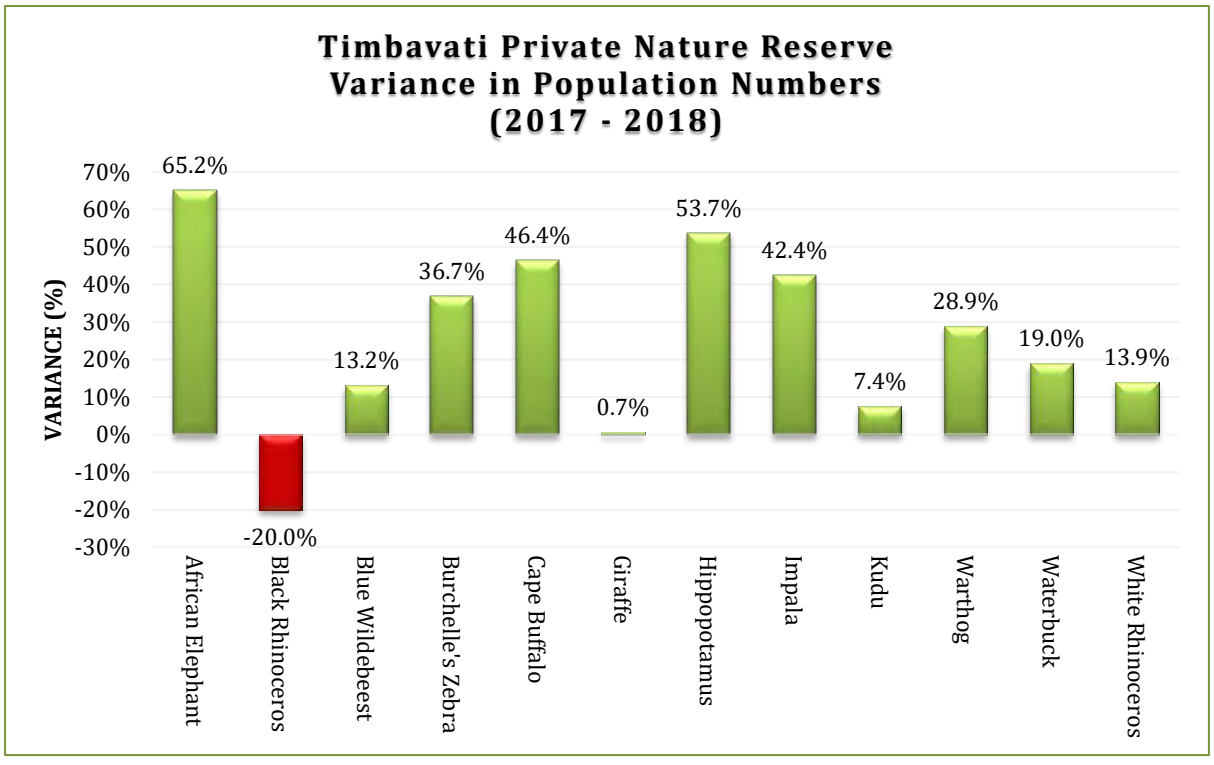


Figure 9 Graph illustrating the variance in population numbers in focus species between 2007 and 2018.

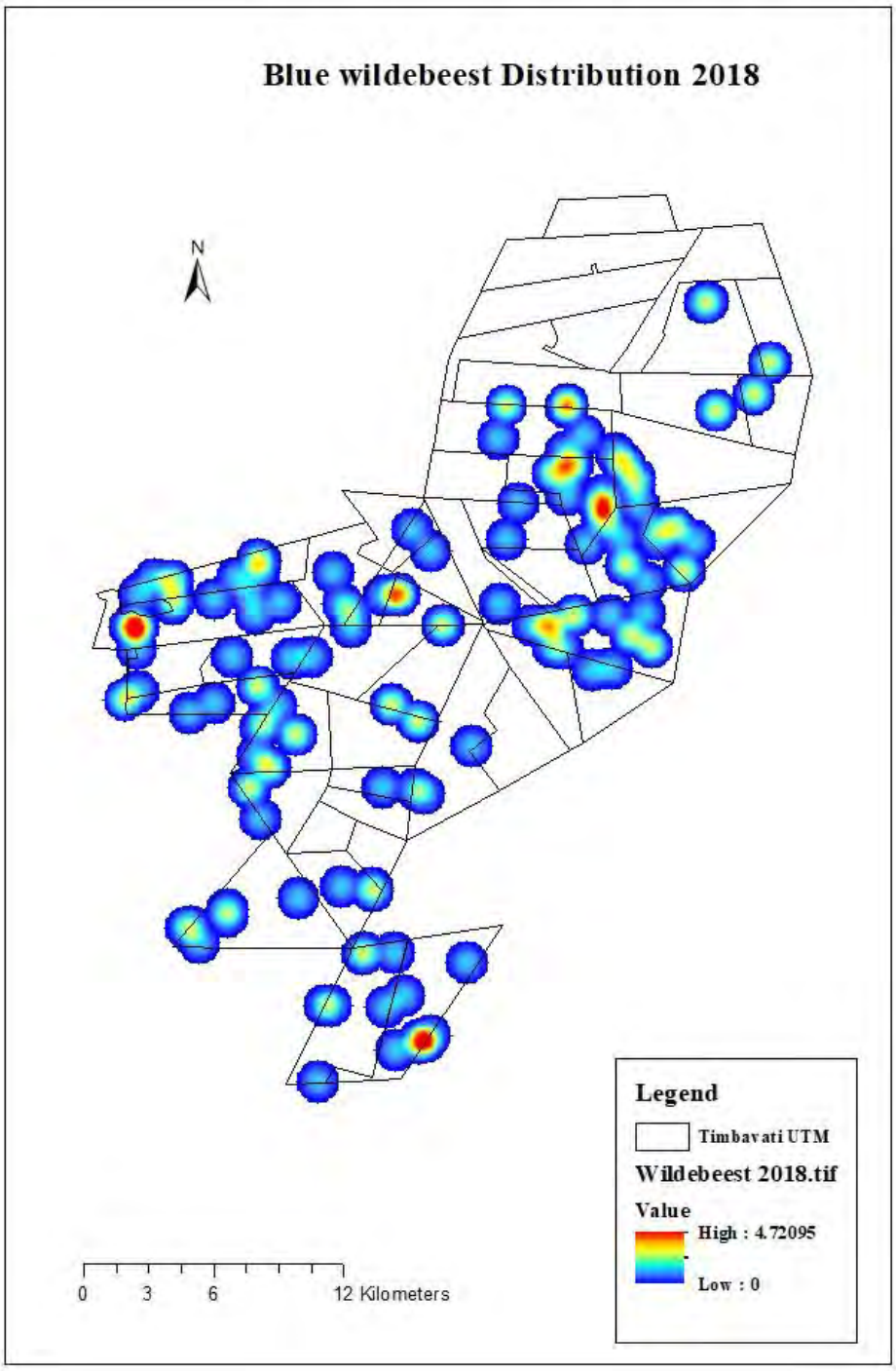
ANNEXURE A – SURVEY PARAMETERS TAC

ANNEXURE 1: Survey parameters Total Area Count (TAC), TPNR 8-10 September 2018.

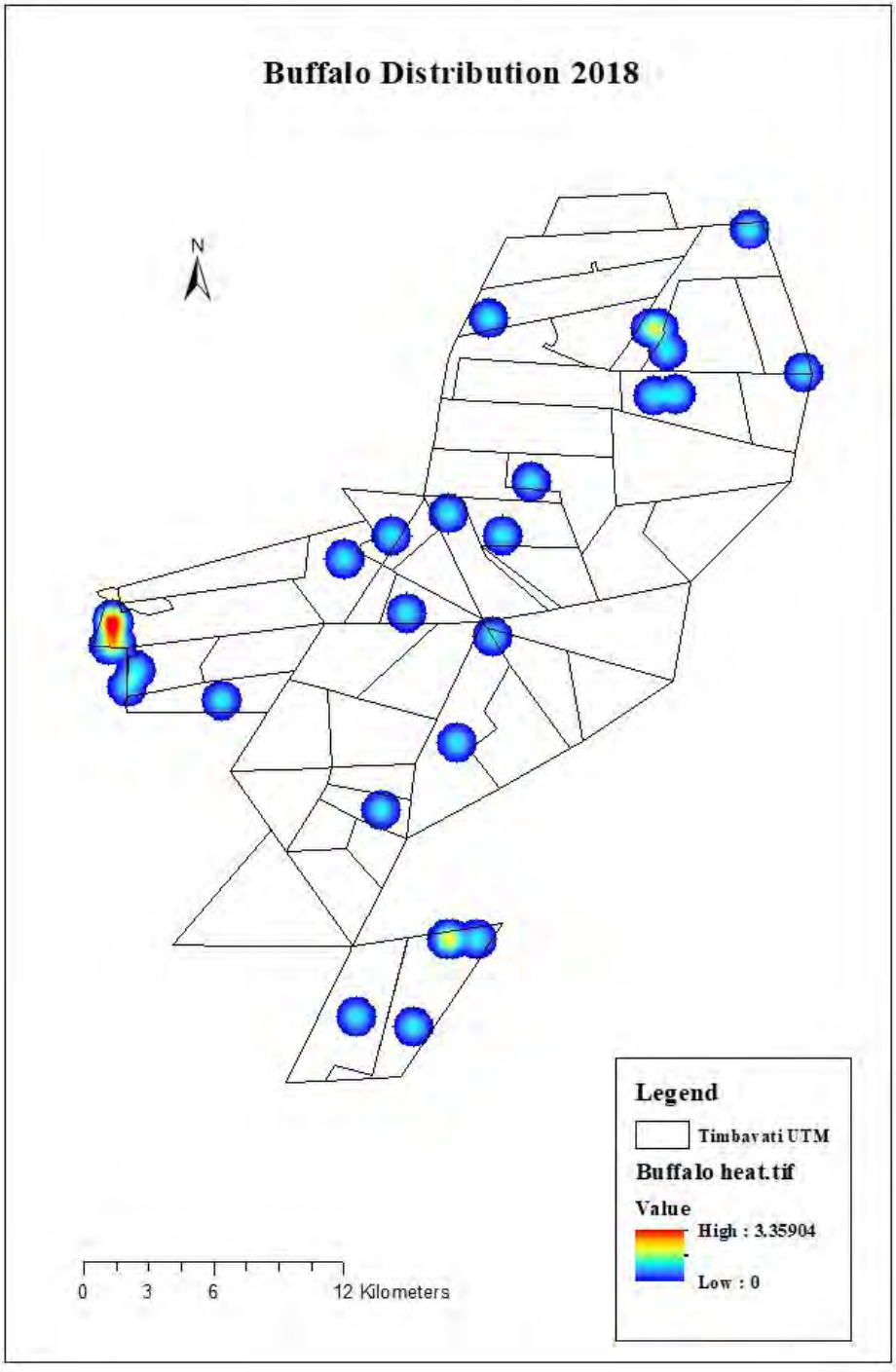
Survey date	8-10 September 2018
Survey area	Timbavati Private Nature reserve. Ngala concession area as depicted
Type of Survey	Total Area Count
Helicopter	Bell Jet Ranger 206 B
Survey Crew	
Pilot:	Mr Mike Pingo (Sunrise Aviation)
Front Seat Observer & data recording	Almero Bosch
Rear Seat Observers	Candice Pierce (one session), Daniel Ball, Edwin Pierce and Kathleen Gibson
Survey strip spacing	500m
Survey height	70-90m
Number of survey sessions	**Day 1:** Session 1: 2h:00 min Session 2: 2h:15 min Session 3: 1h:50 min **Day2:** Session 1: 2h:35 min Session 2: 1h:55 min Session 3: 2h:25 min **Day3:** Session 1: 2h:35 min Session 2: 2h:10 min Session 3: 2h:35 min
Total survey strip length	1566.5 km
Average survey flight speed	90-110 km/hr
Survey time	20.3 hours
Weather conditions	**Day1: 8 September 2018** 19°C-21°C. Light rain within the far South, high clouds, and good visibility on ground.
	Day2: 9 September 2018 15°-23°C. Good visibility during the day.
	Day 3: 10 September 2018 19°-26°C. Good visibility during the day.

ANNEXURE B – DISTRIBUTION MAPS

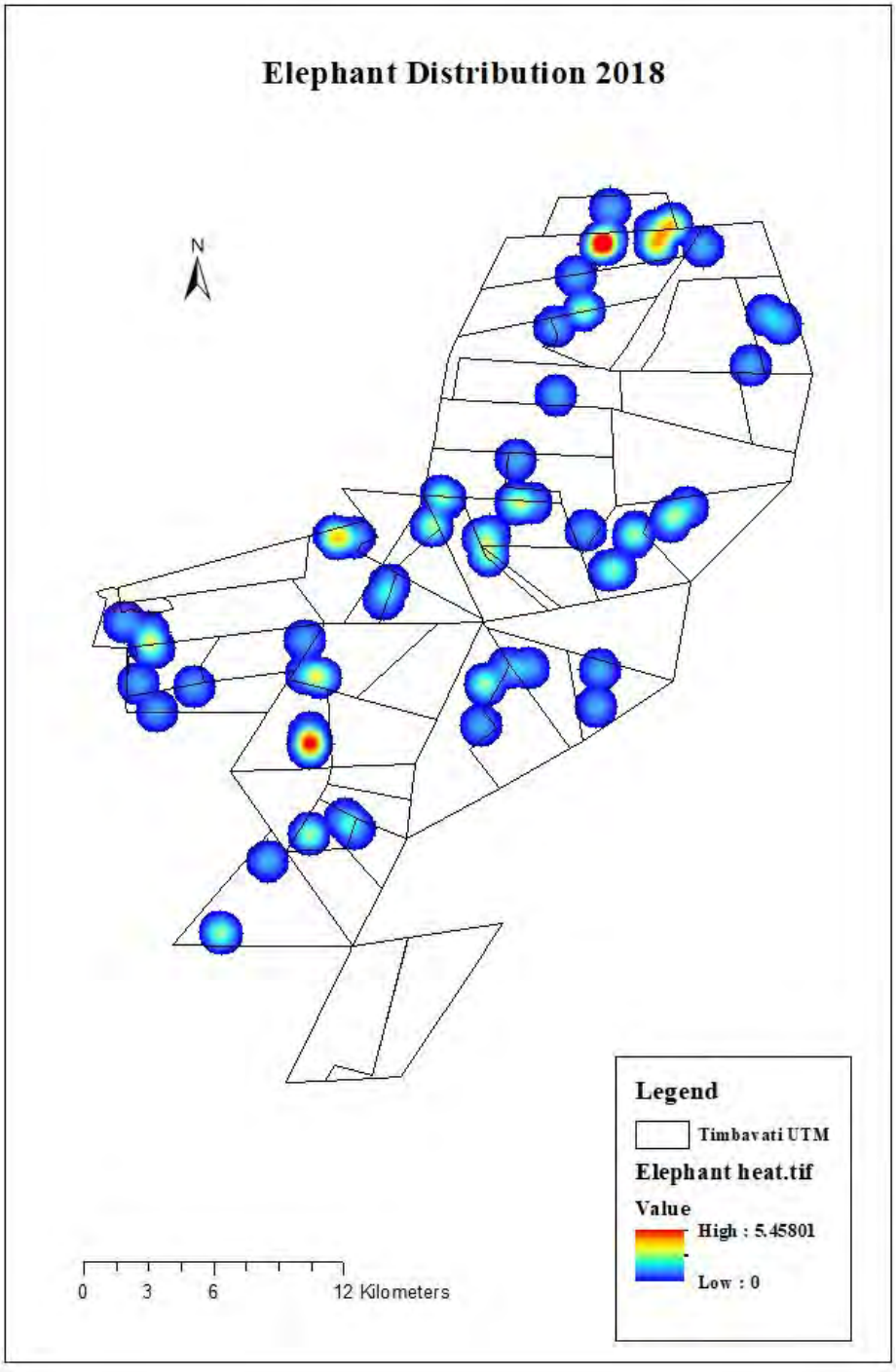
ANNEXURE 2: Blue wildebeest distribution during the 2018 aerial census.



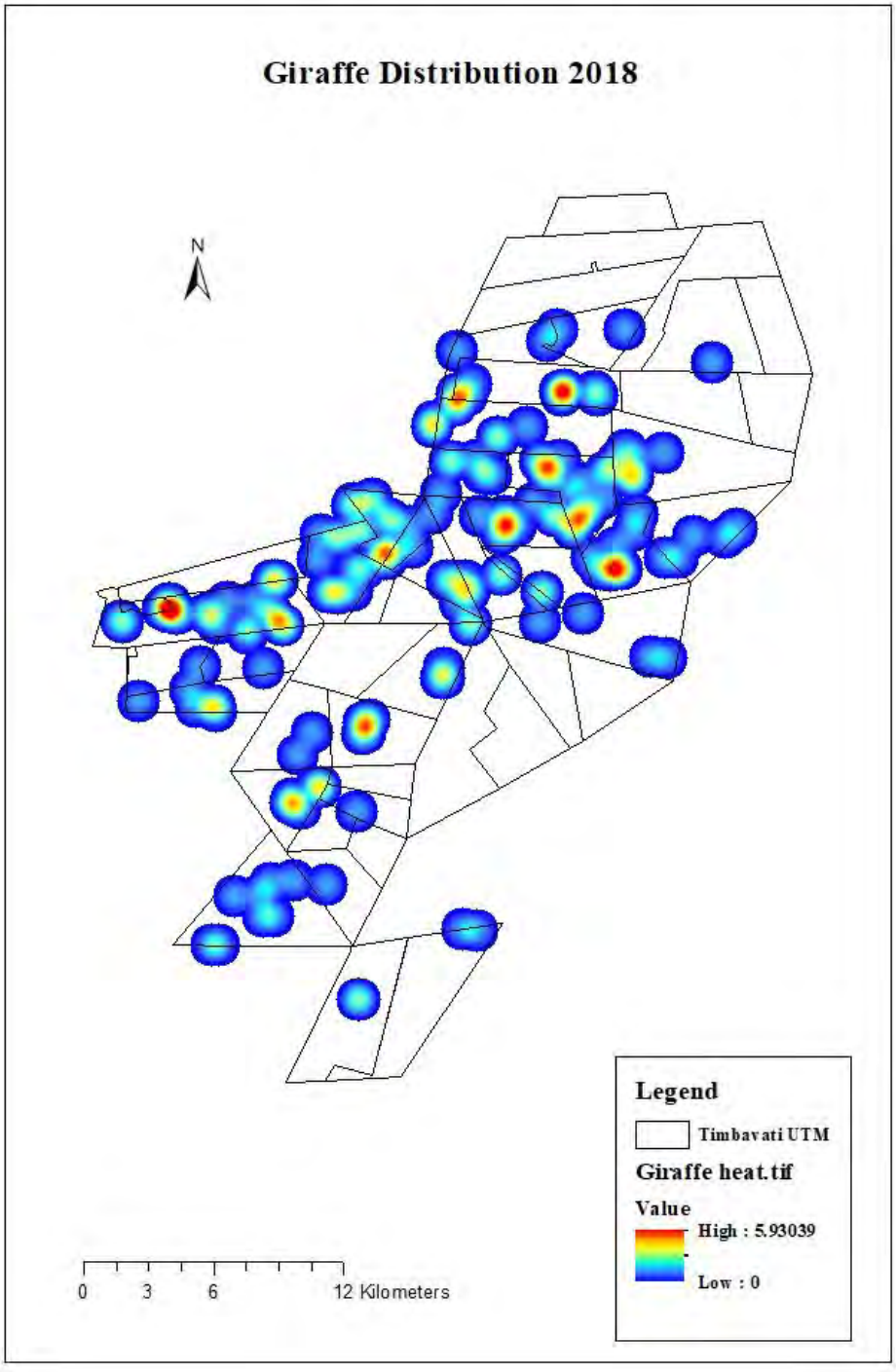
ANNEXURE 3: Cape buffalo distribution during the 2018 aerial census



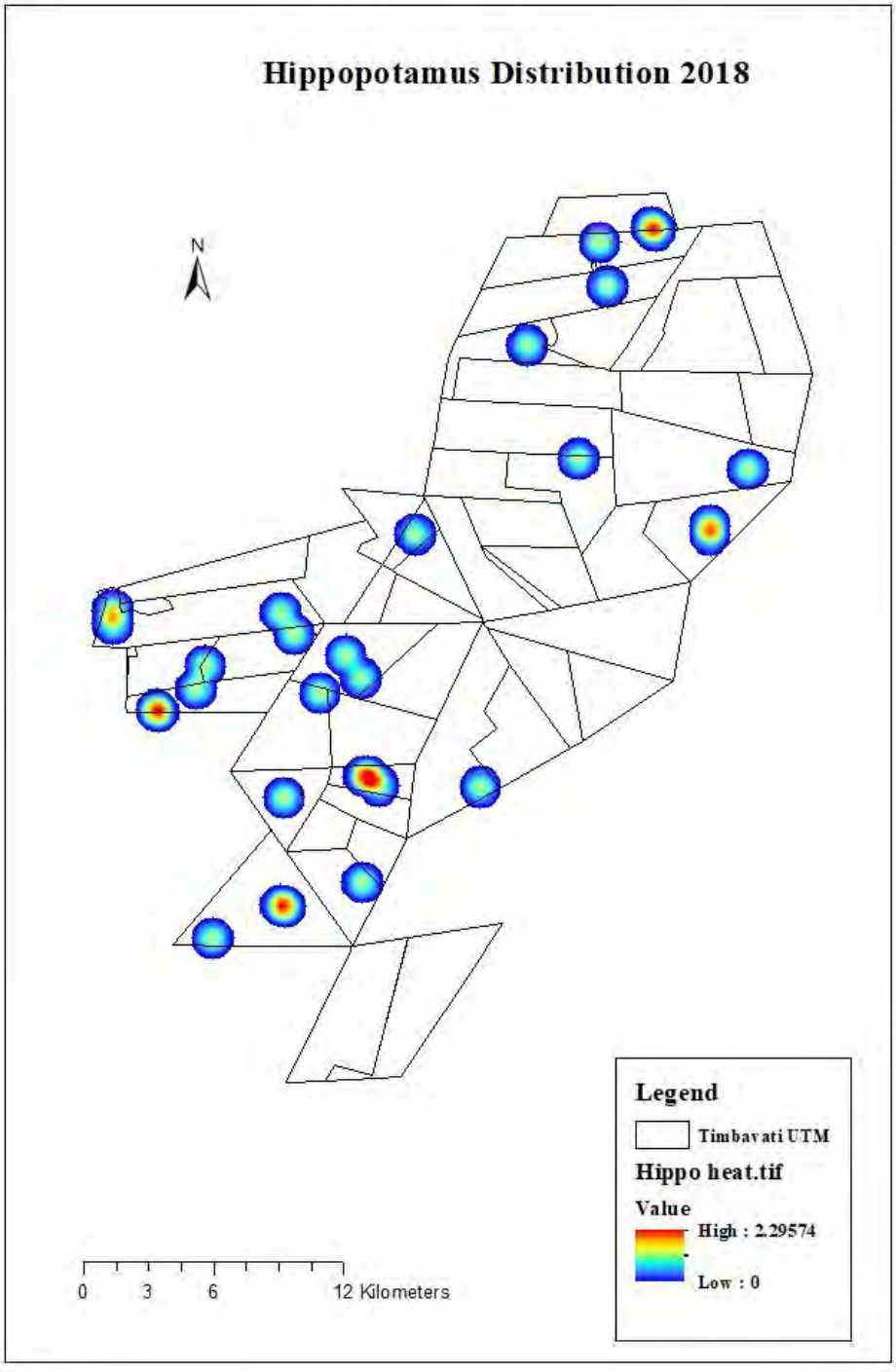
ANNEXURE 4: African elephant distribution during the 2018 aerial census.



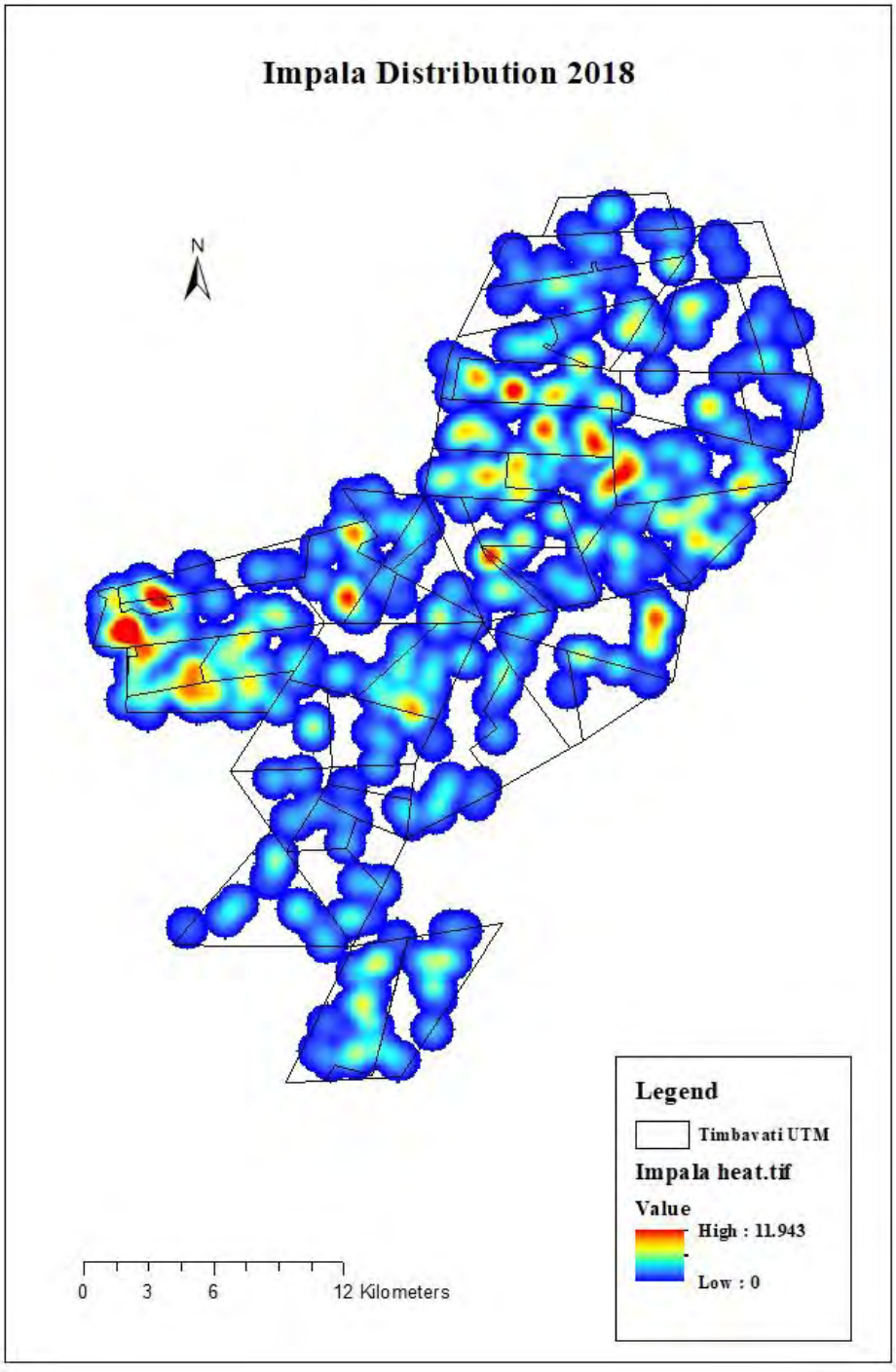
ANNEXURE 5: Giraffe distribution during the 2018 aerial census.



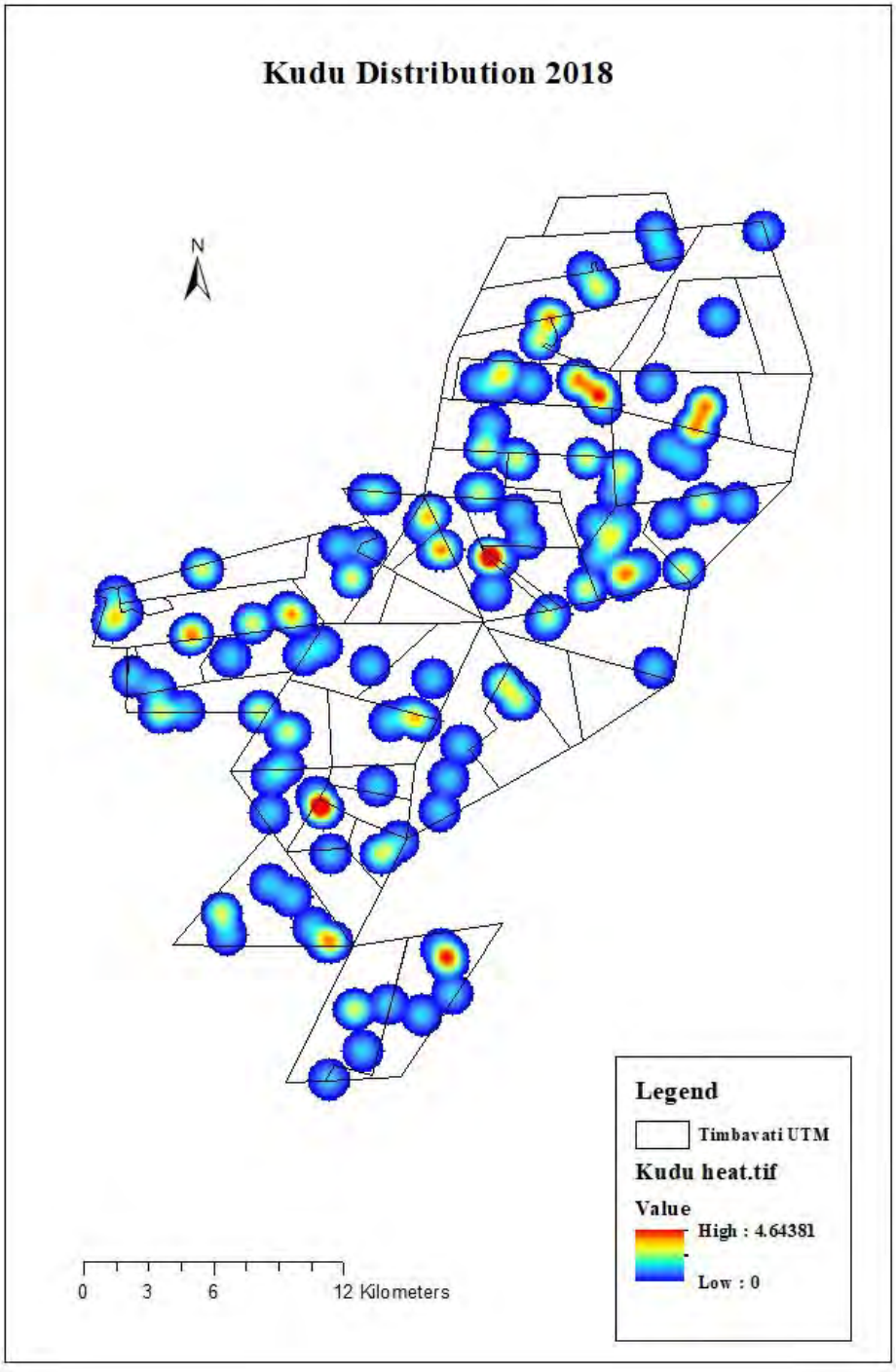
ANNEXURE 6: Hippopotamus distribution during the 2018 aerial census.



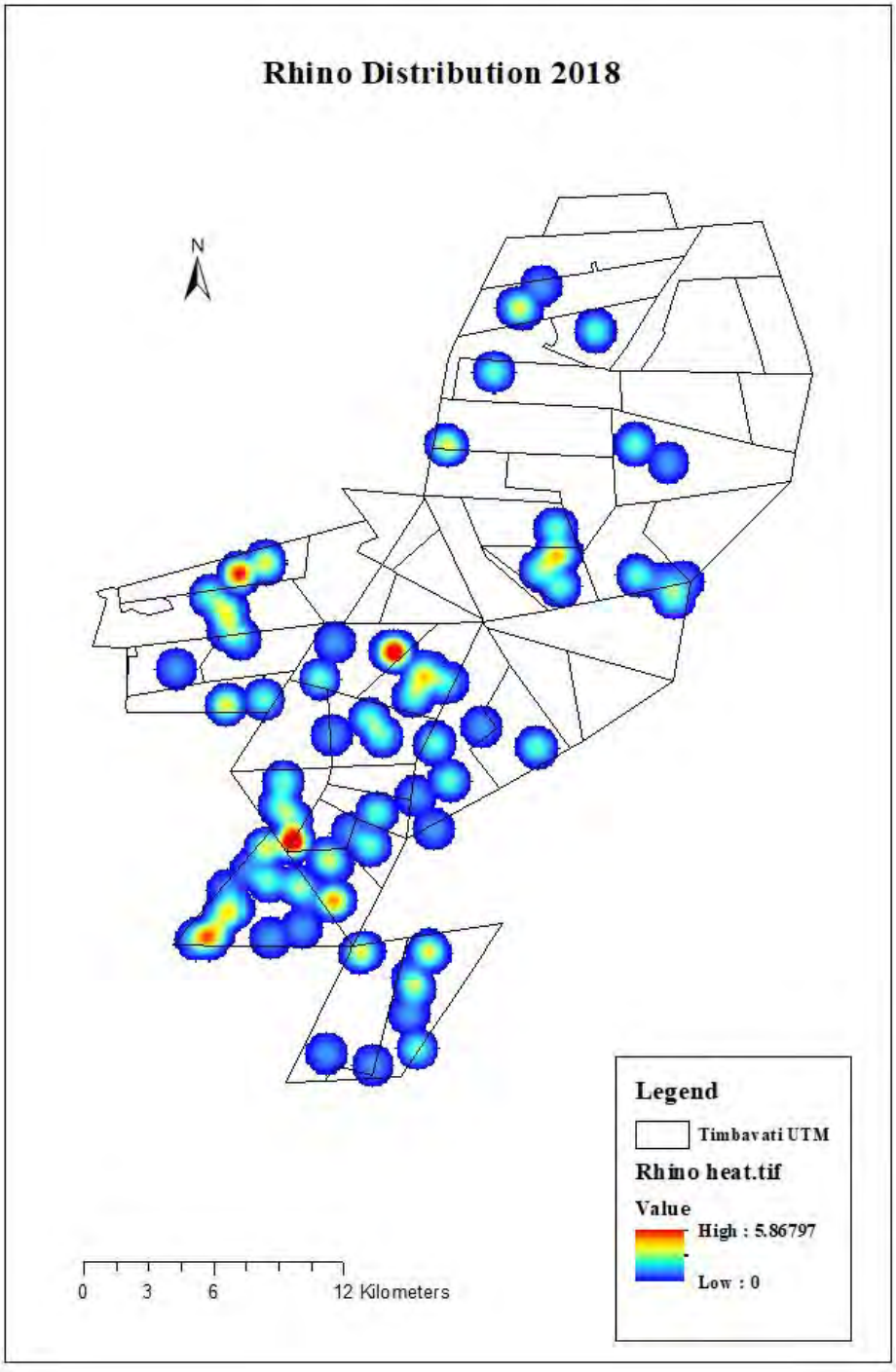
ANNEXURE 7: Impala distribution during the 2018 aerial census.



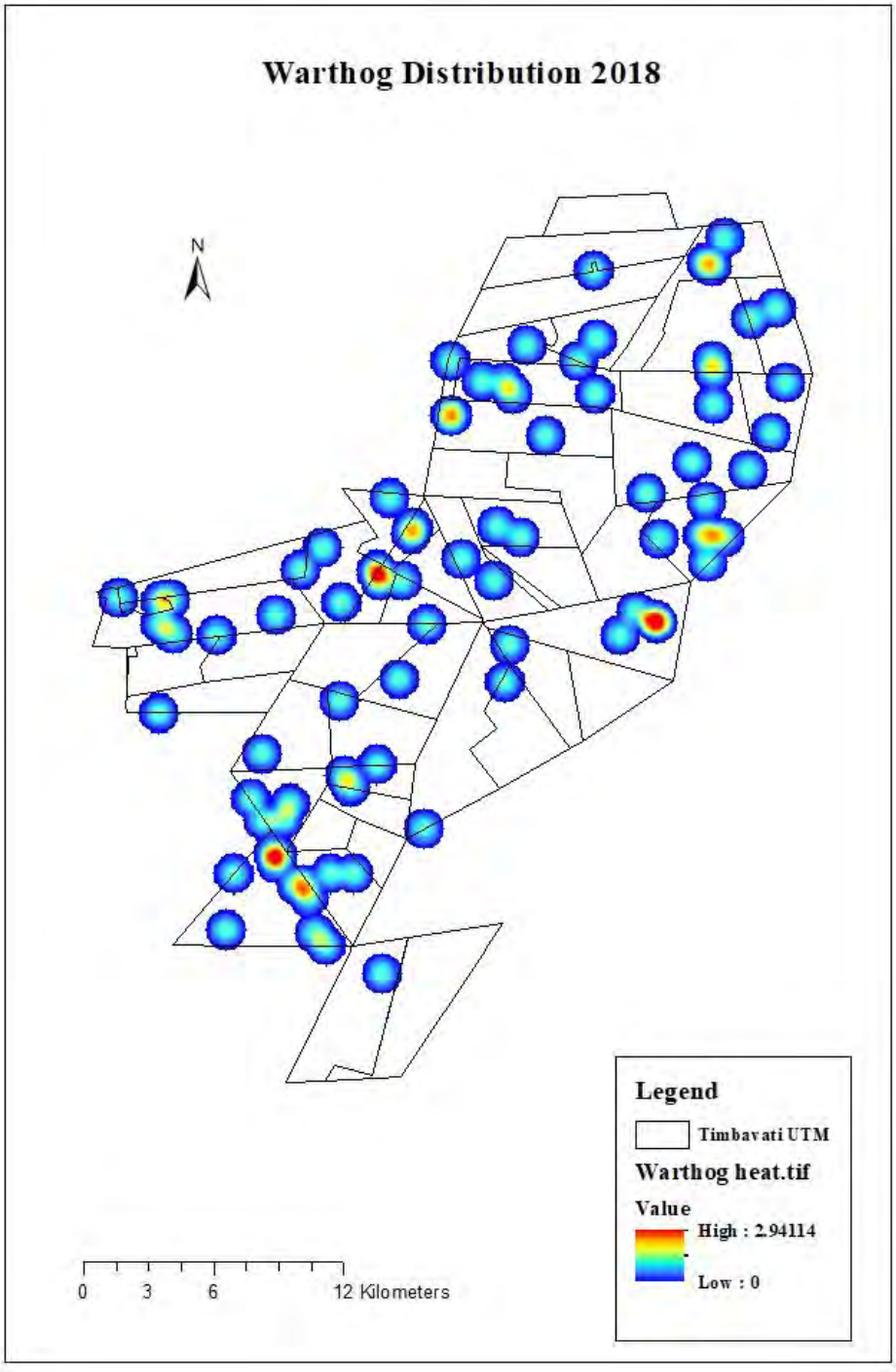
ANNEXURE 8: Kudu distribution during the 2018 aerial census.



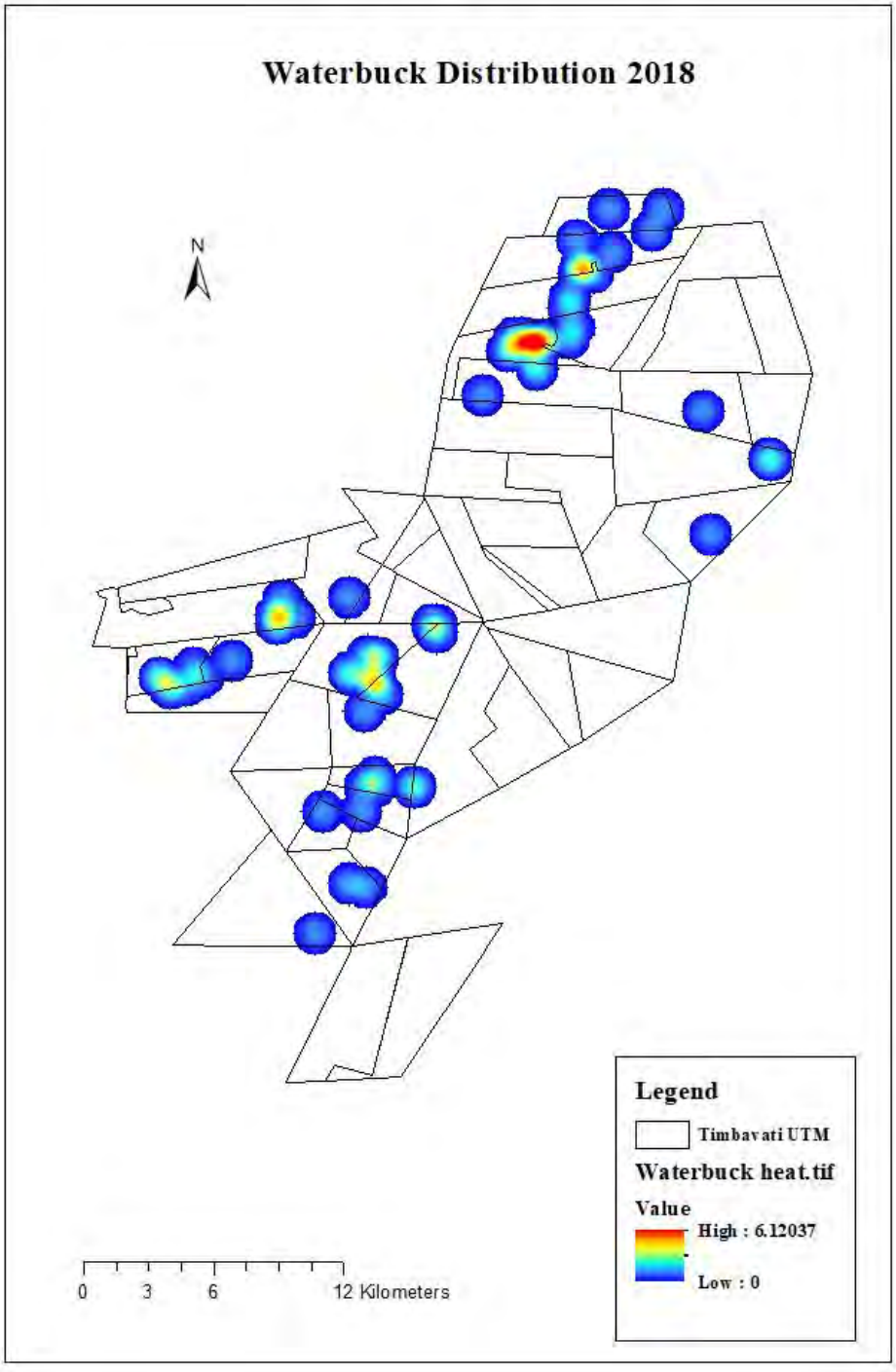
ANNEXURE 9: White Rhinoceros distribution during the 2018 aerial census.



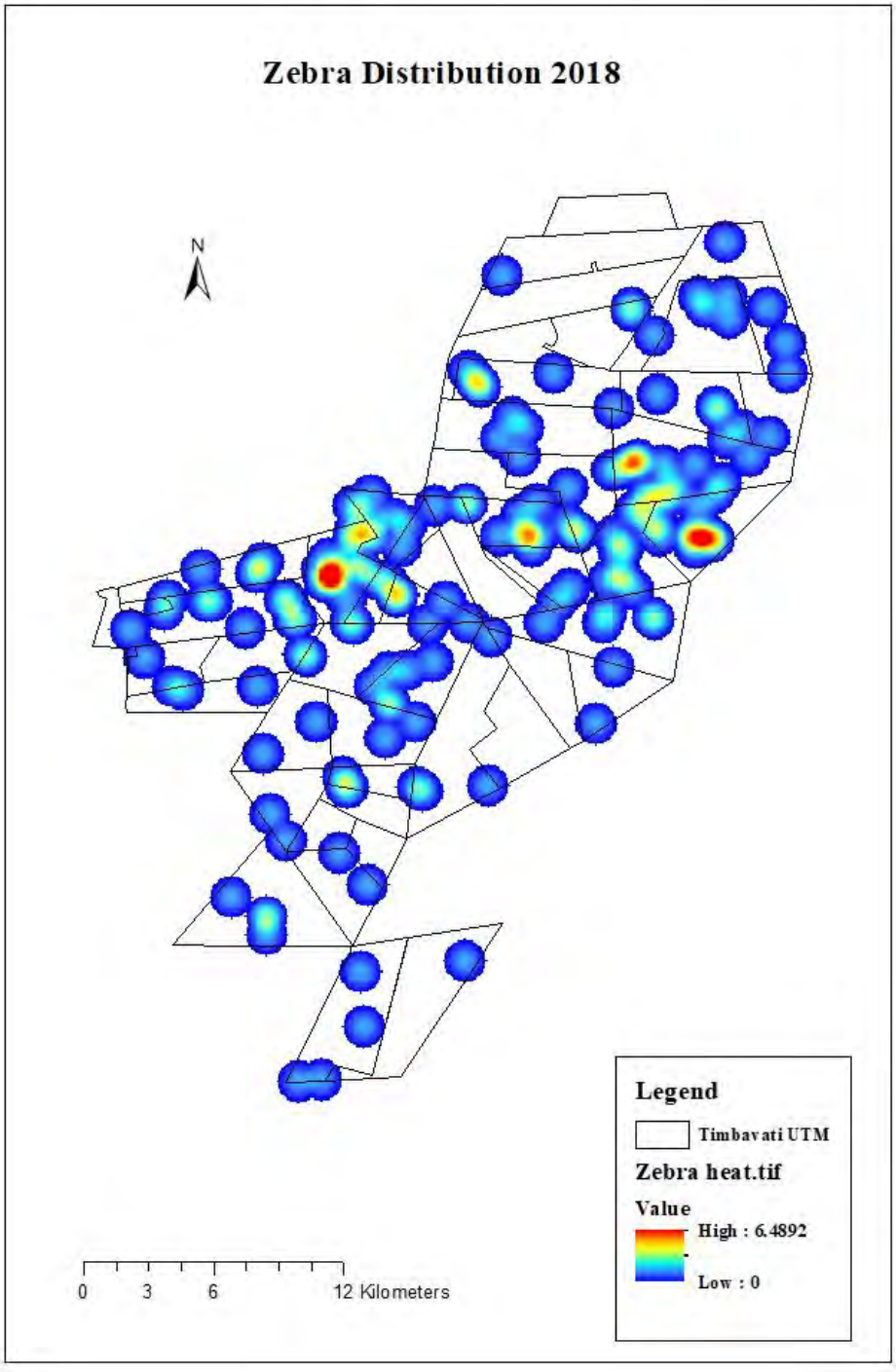
ANNEXURE 10: Warthog distribution during the 2018 aerial census.



ANNEXURE 11: Waterbuck distribution during the 2018 aerial census.



ANNEXURE 12: Burchell's zebra distribution during the 2018 aerial census.



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CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

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December 3, 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD DEC 11 2018

RE: Import Application of Republic of South African Elephant Trophy for Ray Penner

Dear Chief Cogliano:

Enclosed please find the permit application to import an elephant trophy from the Republic of South Africa for Ray Penner. Also attached to the permit application is enhancement information provided by the Mapungubwe Game Reserve. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by South African authorities, outfitters, and others, in making an enhancement finding for Elephant trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Ray Penner's Elephant Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted 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.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6) [redacted]

Name: Ray A. Penner

Date: 11/27/18

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD DEC 11 2018

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

Type of Activity: Elephant

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Penner	Ray	A	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6) [redacted]			

Section B: Complete if applying as a business, agency, Tribe, or institution

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
No. Newton	Kansas	67117	Harvey	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)
(b)(6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
No. Newton	Kansas	67117	Harvey	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.

(b) (6) [redacted]

Signature (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy): 11/17/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for 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)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

   Ray A. Penner (b)(6) [redacted]

   e-mail (b)(6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Genus: Loxodonta africana, 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:

   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 Farm. Alldays

   b. Date wildlife was hunted:

   June 2, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Somerby Safaris
P.O.Box 141
Kestell 9860 South Africa
VAT No. 4960222968

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]:

Universal Trophy Services
Plot 114
Bashewa, Pretoria, 0056
South Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Rupert DeKock
Business Name: Universal Trophy Services
Address: Plot 114
City: Bashewa, Pretoria, 0056
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?

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?

I do not know how the funds were used
I Paid $35,000 US Dollars for 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

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: N/A Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: (b) (6) Date: 11/17/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: Mapungubwe Game Reserve

   a. Years in business: 24 years

   b. Name of company conducting hunt: Mapungubwe Game Reserve

   2. Name of concession: Mapungubwe Game Reserve Size in km^2: 250

   a. Land tenure: __ Government lease __ Community X Private ranch __ Private conservancy

   b. Length of concession agreement: N/A Can it be renewed? __ Yes __ No

   c. Length of renewal, if applicable: N/A

   d. Estimated total amount received in trophy fees last year, if applicable: $ 210 000

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: _ Approved Management plan by Nature Conservation and annual report.

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Alldays Limpopo Province. See attach Map

   g. If the concession borders a national park, please provide the park name: _ Mapungubwe Nat Park

   h. Description of general and distinctive habitat features and any water features: Mopane bushveld with 3 big dams

3. Are there any communities living in the concession? No

   a. If so, estimated number of people or villages in the concession? N/A

4. Are there communities bordering this concession? No

   a. If so, estimated number of people or villages around the concession? N/A

5. Relevant game populations in the concession:[1] See attached documents

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant				
Lion				
Leopard				
Prey species				

6. Total employment number: 11

   a. Please identify the number and type of all employees:

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	3
Trackers	4	4
Anti-poaching scouts/rangers		
Other anti-poaching	4	4
Cooks/housekeepers	6	6
Community coordinators		
Managers	1	1
Biologists	See Attached	
Others: _____		

7. Number of staff employed in the off-season: _____

   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	4	4	Winter
Road opening/construction	7	7	Winter
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: All staff are used for anti poaching when needed but full time 4

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? Both

   c. Months during which anti-poaching patrols are conducted: 12 months

   d. Number of anti-poaching patrols per month: Full time

   e. Description of anti-poaching equipment, vehicles, etc.: Nissan 4x4, clothing camouflage, Binoculars

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Manager

   g. Do you offer rewards to poaching informants leading to arrest? Yes

   h. Do you offer rewards to poaching informants upon conviction? Yes

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

i. 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	R120000.00	R120000.00	R172800.00	
Equipment	R15000.00	R15000.00	R38000.00	Got donations in 2015/16
Vehicles	R110000.00	R160000.00	R234000.00	
Petrol	Not Available	R96 000.00	R156000.00	
Rewards paid	Not available	R27 000.00	R13 000.00	
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	seven	eleven	Three	
Elephant carcasses observed	none	none	none	
Lion carcasses observed	none	none	none	
Leopard carcasses observed	none	none	none	
Ivory poachers arrested	none	none	Three	Stole legal ivory Polygraph
Meat poachers arrested	seven	eighteen	four	
Other poachers arrested	eight	Thirty seven	four	Mainly illegal fishing
Poachers convicted	three	Thirty seven	four	Poachers fined
Snares/gin traps collected	187	347	123	Mainly along Orchard
Firearms confiscated	none	none	none	
Vehicles confiscated	none	one	none	
Bicycles confiscated	none	none	none	
Boats/nets confiscated	14	6	15	Nets
Tusks recovered				Tusks never recovered
Other: _____				

10. Community investment:[3]

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 (e.g., required by law, required by contract, voluntary contribution)? We built and maintain Orphanage voluntary in Alldays Attached documents

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

c. Does the company provide game meat to nearby communities? Yes our orphanage feed 162 children

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: Monthly basis. In hunting season 80% of carcasses

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. N/A

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? N/A

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? Orphanage in Alldays See Attached

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded				
Construction materials donated				
Other: _____				
Other: _____				
TOTALS				

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: five 2016:six 2017: Seven	2015:none 2016:none 2017:one	2015:one 2016:none 2017:none	2015: nine 2016:thirteen 2017:eighteen
Percentage of U.S. clients	2015:80 2016:100 2017:100	2015:0 2016:0 2017:100	2015:100 2016:0 2017:0	2015:10 2016:25 2017:50
Trophy fees paid by U.S. clients	2015:80000 2016:120000 2017:175000	2015:0 2016:0 2017:45000	2015:12000 2016:0 2017:0	2015:30000 2016:35000 2017:63000

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:

$283000.00

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: _____

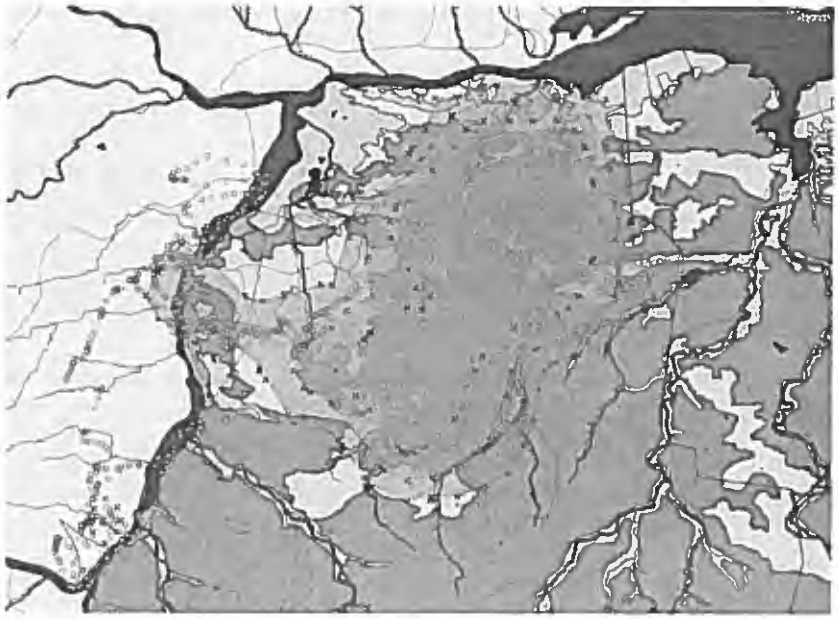
Name: Eugene Small Title: Manager

DETAILS OF ELEPHANT COLLARED ON MAPUNGUBWE GAME RESERVE

Collared elephants

Satellite collars are used to gather information on herd structure, dynamics, movement and splitting/merging of groups; In the NTGR , 5 cows and 1 bull have been fitted with a satellite collar of which unfortunately only one collar still works today (referred to as Tuli 2). In VLNR one elephant cow has been collared in September 2011 and whose collar is still functional at present. **Since the 7th of May 2012, a new female elephant has been collared on the Mapungubwe Game Reserve called "LEILA". This elephant Cow is part of a herd of 55 animals.**

The following are the movements of the elephant "LEILA" over one year period, 1 May 2012 till 1 May 2013, send by the Satellite Collar every 30 minutes



As the results show, this group stay on Mapungubwe Game reserve for more than 11 months of the year, where they would stray into Botswana for small periods.

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.

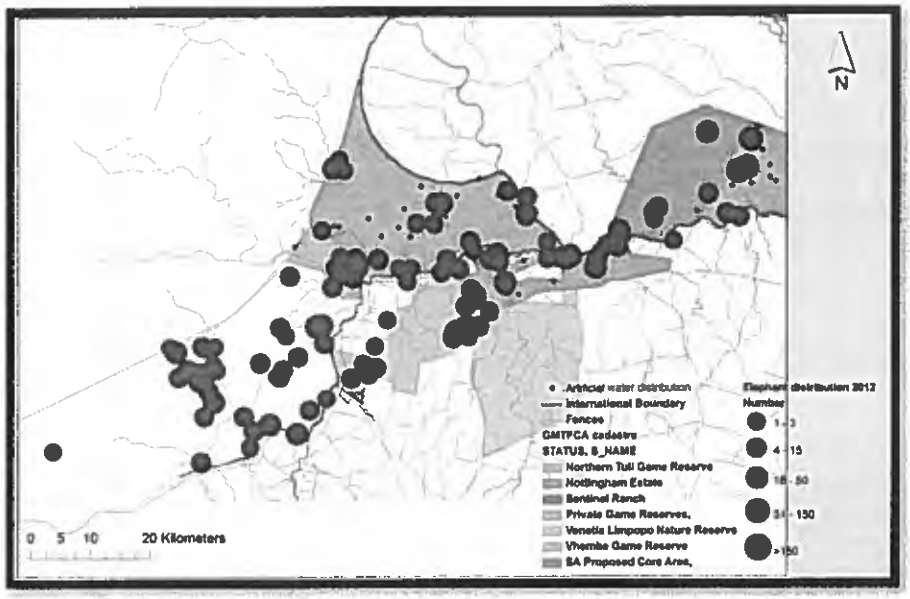
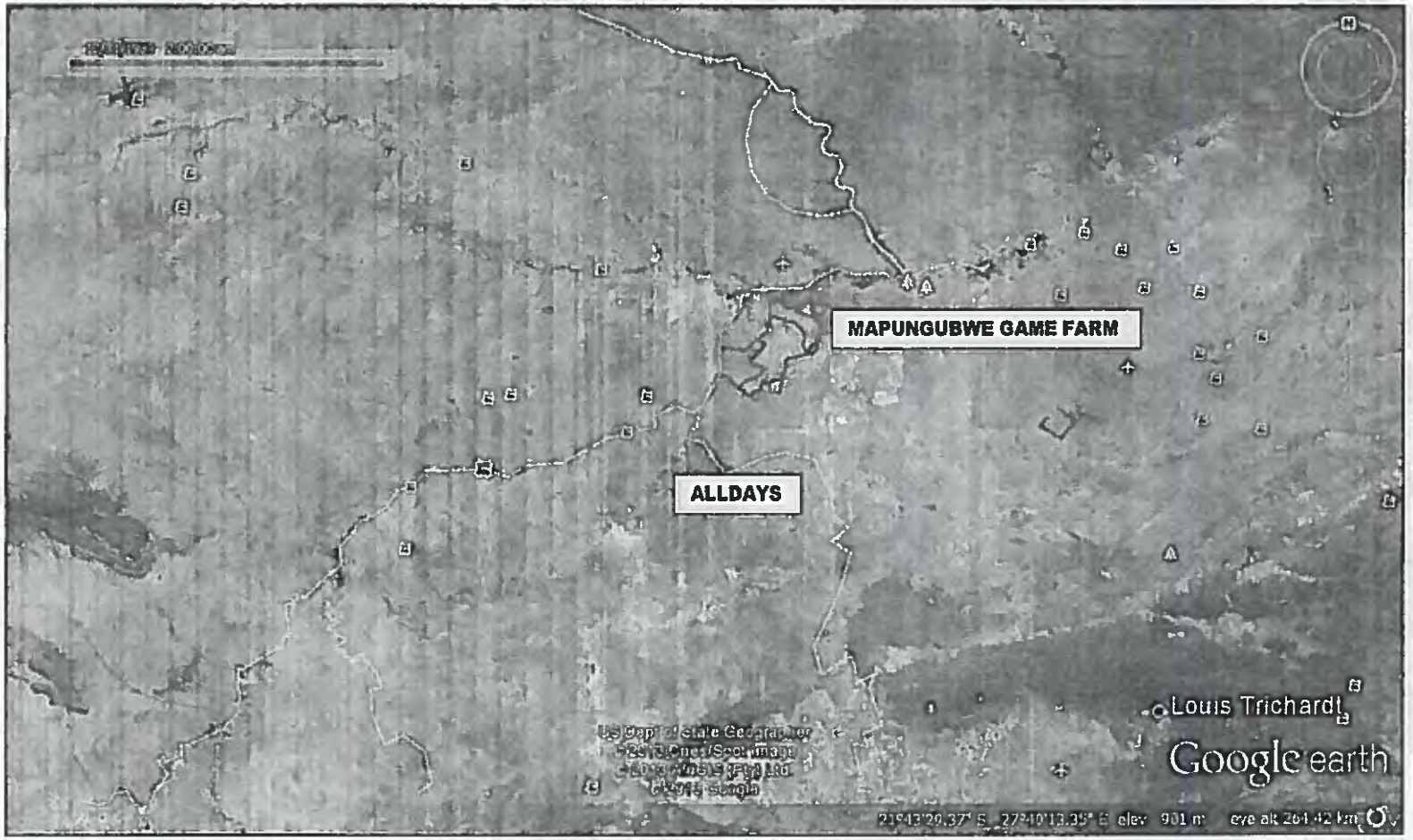


Figure 1: Elephant distribution and group sizes during the September 2012 total aerial count conducted in the Central Limpopo River Valley

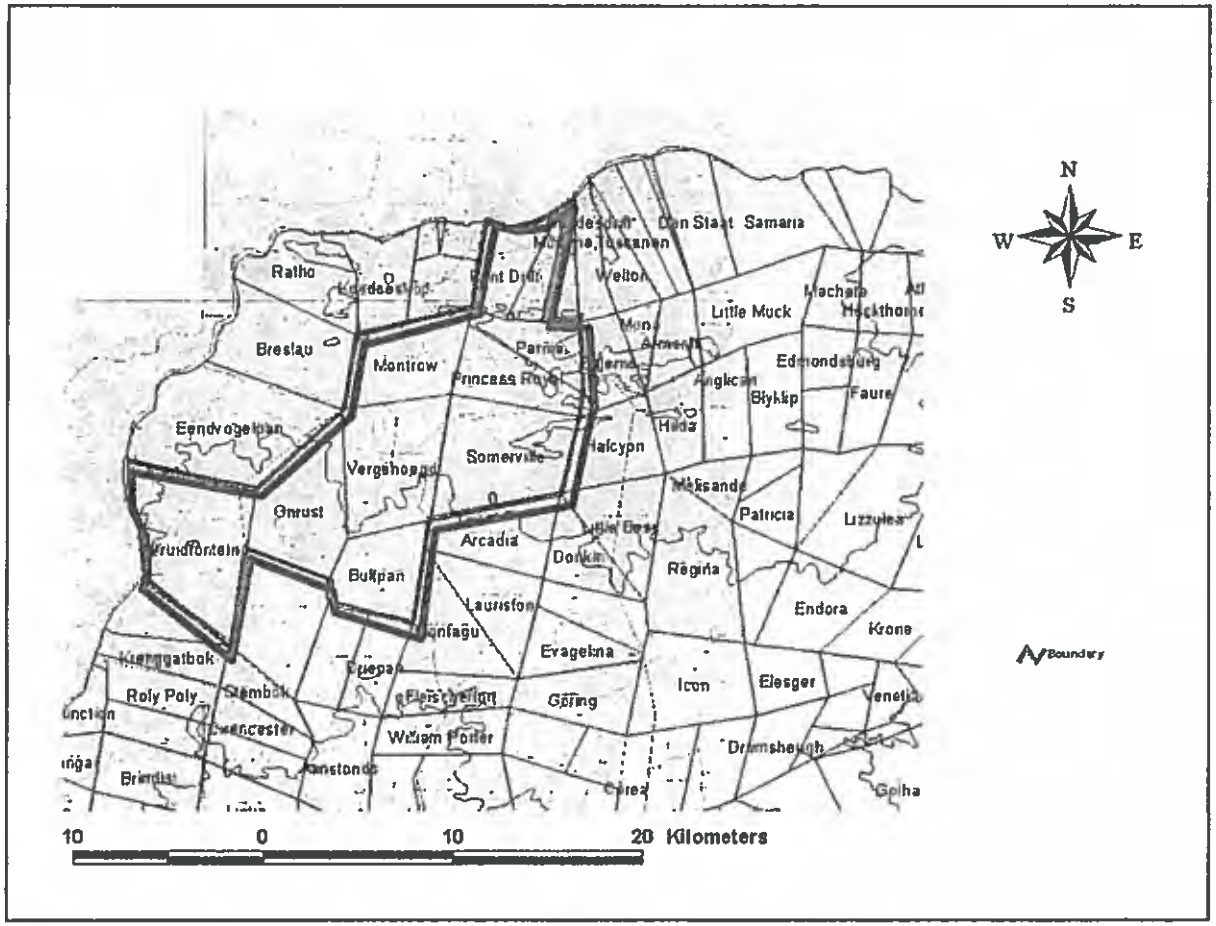
Management Area	Total Counted						
	Aug 00	Jul 01	Oct 04	Jun 07	Aug 08	Sep-10	Sep-12
Botswana - NTGR	512	877	291	603	476	461	320
RSA - Mapungubwe National Park	0	10	2	115	33	210	127
RSA - Farms	5	5	5	0	53	72	123
Zimbabwe - Tuli Safari Area	57	0	0	3	0	0	0
Sub total	574	892	298	721	562	743	570
Botswana - 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
Sub total	170	104	270	115	31	304	353
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
Sub total	145	10	150	0	0	0	0
TOTAL	1262	1294	1240	1080	1229	1237	1291

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

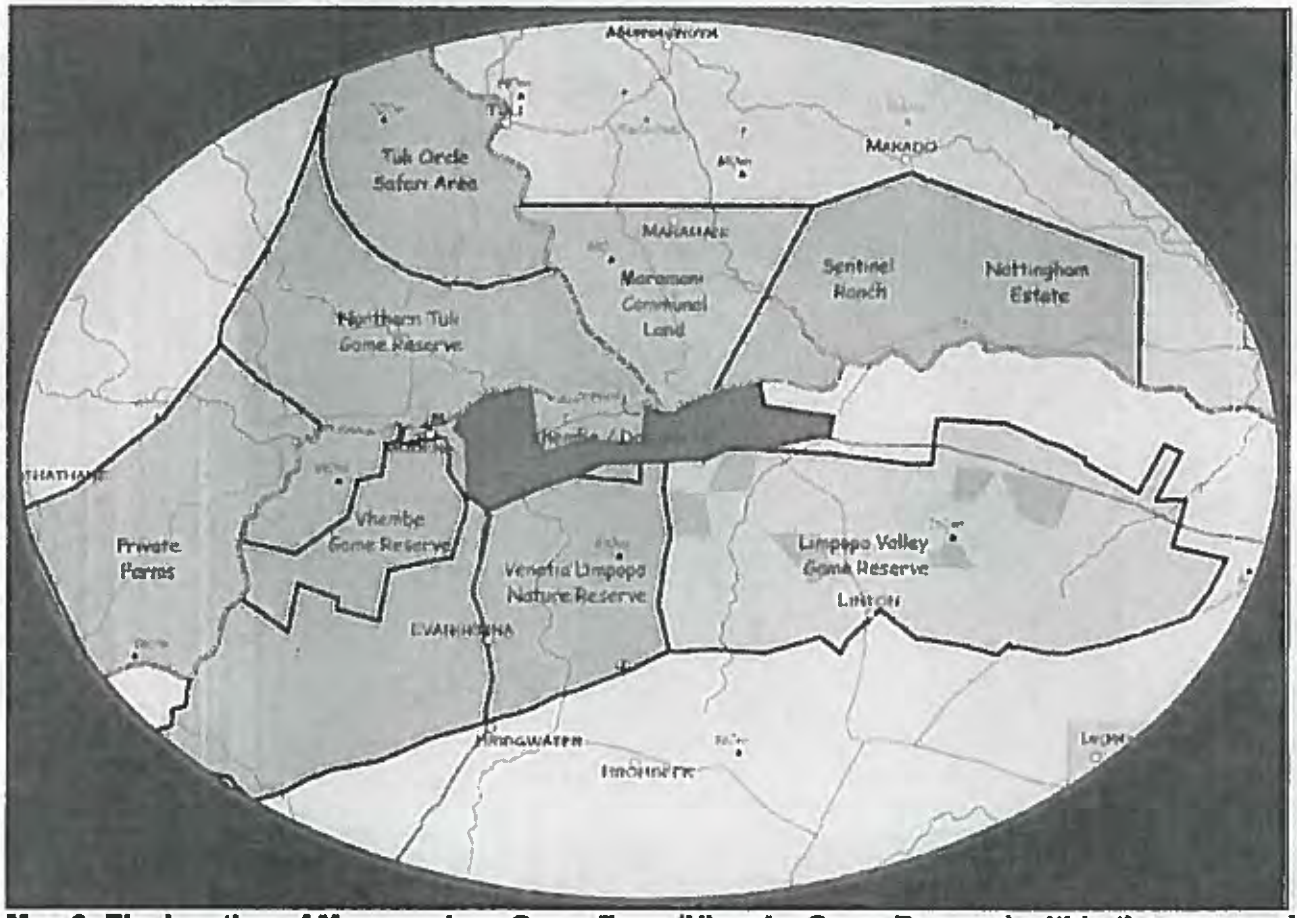
The overall elephant distribution remained very similar between counts. Numbers of elephant south of the Limpopo River have increased steadily since 2007, while numbers within the Tuli Block west of the Motloutse River and the Northern Tuli Game Reserve fluctuate between years. The total number of elephants counted within the study area further remains 1200 – 1300, indicating that at least for the dry season this population remains stable. Group sizes are strongly correlated to rainfall with a higher number of small groups within years with low rainfall and fewer but larger groups in years with high rainfall.



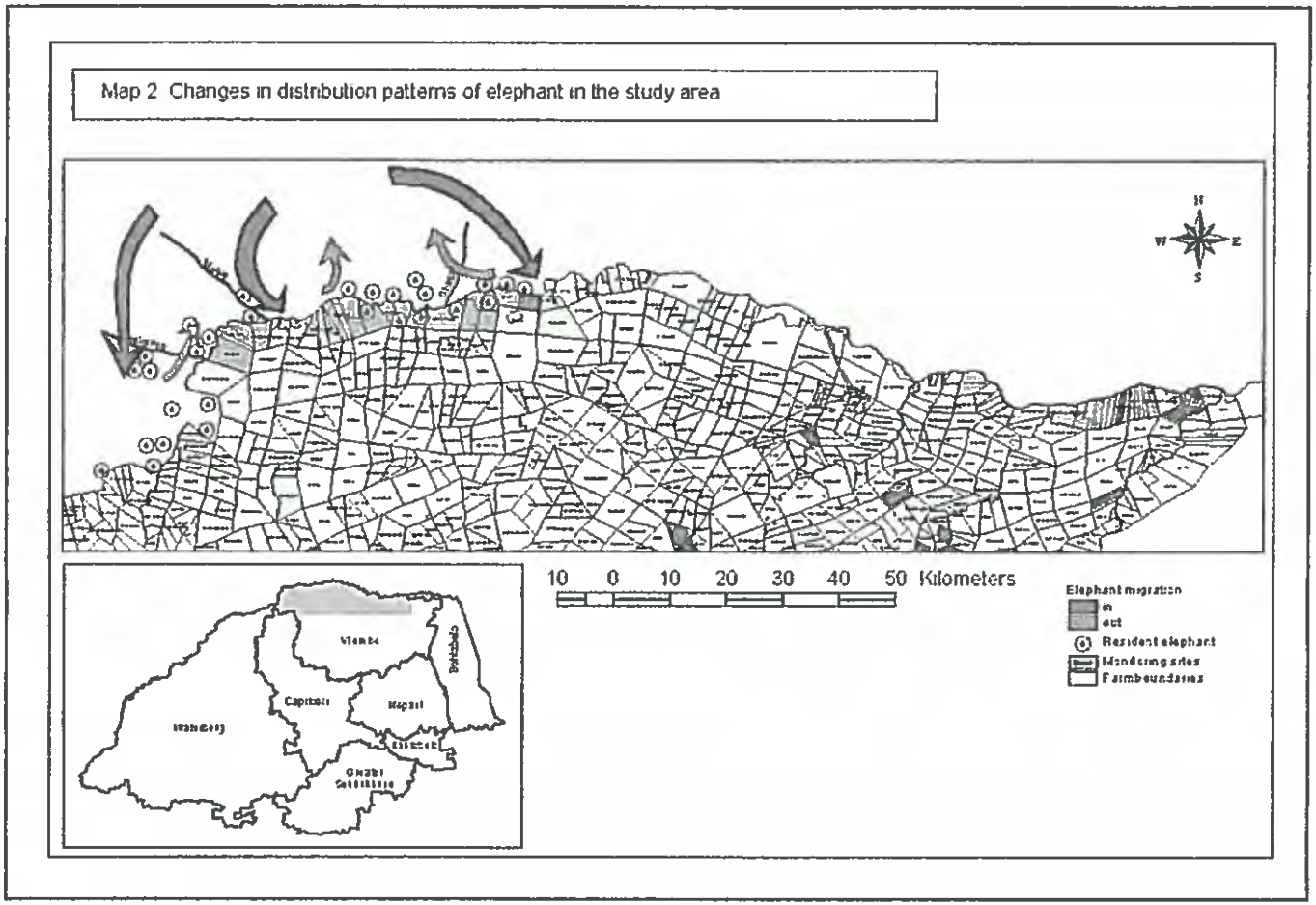
Map 1: Location of Mapungubwe Game Farm



Map 2: Location of Registered farms on Mapungubwe Game Farm



Map 3: The location of Mapungubwe Game Farm (Vhembe Game Reserve) within the proposed Transfrontier Piece Park (Bedetti, 2012)



Map 11: Elephant migration

Rahmqvist Foundation

Toggle navigation

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 Mapungubwe Game Reserve, 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.

More about us

ORPHANAGE

To strengthen the orphanage organization we are establishing a partnership with Norsa Community Care.

Read more

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. We have successfully trained two courses of four woman each to became seamstresses, six chef's and still full time training for 2018

Read more

WANT TO HELP?

Rahmqvist Foundation Centre is a charity project. We feed 162 children every day, with meat harvested from my ranch Mapungubwe Game Reserve by local and foreign hunters. Extra 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!

Read more

CONTACT US

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

December 3, 2018

RCVD DEC 11 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Import Application of Zambia Elephant Trophy for John Ferguson Jr.

Dear Chief Cogliano:

Enclosed please find the permit application to import an elephant trophy from Zambia for John Ferguson Jr. Also attached to the permit application is enhancement information provided by the Kwalata Safari Company including a map of the area where the hunt will take place. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambian authorities, outfitters, and others, in making an enhancement finding for Elephant trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- John Ferguson Jr.'s Elephant Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted 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 the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: John W. Ferguson, Jr.

Date: 11/21/18

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD DEC 11 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: Zambia African Elephant

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ferguson	John	Wayne	Jr.

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Colorado Springs	Colorado	80908	El Paso	United States

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar 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. 100

(b) (6)

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures)

11/21/18

Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

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.

   N/A

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   John J. Jackson III, (504)837-1233, JJJ@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Genus: Loxodonta africana, 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:

Zambia, Area: Lower Lupande GMA, Region: South Luangwa, City: Mfuwe.

   b. Date wildlife is to be hunted: September, 2019

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Kwalata Safaris, Zambia - Werner Van Noordwyk, Professional Hunter: See report.

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

N/A

   b. Date wildlife was hunted: N/A

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

N/A

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). I have not yet hunted 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:	EMIAC World-Wide
Business Name:	P.O. Box 753
Address:	Kelvin 2054
City:	Sandton
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?

   See materials provided by Zambia, Conservation Force, and Attachments

   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?

   With trophy and government fees the hunt will be between 40k-45k.

   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, I have included a Kwalata Safaris enhancement report with this application.

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: 11/21/18

    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).

KWALATA SAFARIS, LTD.
Address, 6980 KATANGA ROAD LUSAKA
Operator email: kwalatapeter@yahoo.coml

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 kilometre 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 $25,000. 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 2017, our teams picked up about 508 snares and 51 gin traps. Removing snares protects the lion population by reducing incidental snaring. Over the past year we arrested more twenty two poachers, confiscated eight muzzle loaders from them. We also found some evidence of illegal lodging,

WIRE SNARES RECOVERED BY OUR ANTI-POACHING TEAM

IN THE PICTURE ABOVE POACHERS TRAPPED AN IMPALA USING WIRES

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 Fuel 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 2017 Kwalata Safari Company spent almost $61200 in our blocks on anti-poaching patrols, equipment, and assistance to the Wildlife Authority and community scouts, including by providing 7350 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	25,600	Directly paid and some subsidies to WA
Scout equipment	9000	Clothing, vehicles, rations, phones, tents, etc.
Diesel / petrol	12300	For scouts and WA
Rations for WA and community scouts	8100	
Rewards	6200	For information and arrests
TOTAL	**$61,200**	

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. In 2015 we funded and supplied the following projects at each village's choice:

Village	Projects	Amounts (USD)
Village 1	Funded a sensitization campaign against poaching which was followed up by a workshop for Community Leaders and Parks Employees	13,300
Village 2	Contributed to the eradication of cholera which hit the community	10,010
	Graded the roads leading to the chief palace and Parks offices	5,300
	TOTAL	$28,610

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.

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.

IN THE PICTURE ABOVE A SENSITIZATION WORKSHOP GOING ON WITH MEMBERS OF THE COMMUNITY AND DEPARTMENT OF NATIONAL PARKS

B. FUNDS FROM CLIENTS

We also maintain an approximately $12000 fund of client donations which we use for community compensation. Elephants usually destroy crops for the villages and these funds assist to compensate the villagers for losing their crops. This way villagers are encouraged not to poach any animals for food which results in a lot of prey for predators to hunt.

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 Bufallo and Plains Game populations to keep increasing at a rate 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 of 2015 to take record of sightings and record the activities on the specific safari being done.

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.

Further the Department of Parks has introduced punitive measures to both the Professional Hunter and the Safari Outfitter who hunts any Lion below five years.This has lessened the careless hunting of Lion under five years because of these strict adhereance rules.The punitive measures include suspension of the Professional Hunters'License and cancellation of the lease agreement for the Safari outfitter with the Department of National Parks.

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 so 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, sustainable-use based hunting program enhances the survival of the lion and Elephant. Our program helps to preserve and improve available lion and Elephant 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.

-------- Forwarded Message --------
Subject:RE: John Ferguson - Elephant Hunt
Date: Mon, 5 Nov 2018 11:42:50 +0200
From: Werner Van Noordwyk <werner@vannoordwyksafaris.com>
To:'John J. Jackson, III' <jjj@conservationforce.org>

Hallo John.

Good to hear from you Sir.

Find attached the Map of the Zambia hunting concessions.
You will find Lower Lupande on the Eastern Boundary of the South Luangwa National Park just below the town called Mfuwe.

Let me know if this Map is good and will help for you.

We could use this Map probably for all our concession applications when we reply with you all for our areas and if it would help I can send you our concession names that we have for future references.

Best Regards and all the best for the weekend ahead.
Werner.

Werner van Noordwyk
Postnet Suite 98
Private Bag X 504
Sinoville, Pretoria
South Africa
0129

Web www.vannoordwyksafaris.com
Tel : + 27 824927362
Sat : + 88 21621156978

van NOORDWYK

From: John J. Jackson, III [mailto:jjj@conservationforce.org]
Sent: Friday, 02 November 2018 5:30 PM
To: Werner van Noordwyk <werner@vannoordwyksafaris.com>
Subject: John Ferguson - Elephant Hunt

Mr. Noordwyk,

Can you please provide Conservation Force with a map of the location of the hunt for John Ferguson? We will need to provide this for USFWS on the permit application. Also, thank you for providing an operator enhancement report.

Thanks,

John

--

Conservation Force
3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax: (504) 837-1145
jjj@conservationforce.org • www.conservationforce.org

Virus-free. www.avast.com

Map of Hunting Area - John Ferguson
Nyika
North Luangwa
South Luangwa
Lukusuzi
Kasanka
Lavushi Manda
Lower Zambezi
Kafue
Lochinvar
Liuwa Plains
West Lunga
0 37.5 75 150 225 300
Kilometers
Legend
towns
lakes
city
hunting areas
roads
national parks
rivers
country boundary

RCVD AUG 5 2016

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Hixson	Robert	L	Jr

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)	
2. Tax identification no.	3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Carrollton	TX	75006	Dallas	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Dallas	TX	75381	Dallas	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 [X] If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 2006-05US108781/9 2002-01US043605/9 No [ ]

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of m[illegible] hat any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 6/25/16

Signature [illegible] ible 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:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: Zambia, Chikwa Hunting Block, Luangwa Valley, Eastern Province Nearest Town - Lundazi
   b. Date wildlife is to be hunted: 7/23/16 - 8/21/16
   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:

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: Michael W. Borman
Business Name: Bangweulu Taxidermy Ltd
Address: 4142/K Chifwema Road
Address: New Kasama
City: Lusaka
State/Province: Lusaka 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.

e information attached with this application and the information submitted by Za

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, can

Applicant's signature: (b) (6) Date: 9/25/16

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):
    John J. Jackson or Regina Lennox, 504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

    ☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import an African elephant trophy and an African lion trophy from Zambia.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my lion trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signe (b) (6) [redacted]

Name: Robert L Hixson Jr

Date: 4/13/16

United States Department of the Interior

FISH AND WILDLIFE SERVICE

International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

SEP 12 2017

MEMORANDUM

To: Chief, Division of Management Authority

From: Chief, Division of Scientific Authority Rosemarie Gnam

Subject: General Advice on Importation of Sport-hunted Trophies of African Elephants taken in Zambia in the Calendar Years 2016 and 2017

This General Advice represents our Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) finding for permit applications that you have received, or may receive in the future, for the import of sport-hunted trophies of African elephants (*Loxodonta africana*) taken in Zambia in the calendar years 2016 and 2017.

Please be advised that, based on the available information as of the date of this finding, we are able to determine that the importation of sport-hunted trophies of African elephants taken in Zambia in the calendar years 2016 and 2017, will be for purposes that are not detrimental to the survival of the species. This General Advice applies only to African elephant sport-hunted trophies lawfully taken in Zambia during calendar years 2016 and 2017 (i.e., January 1 through December 31), provided that they are to be imported by the persons who hunted them for personal use or personal display.

This finding is based on the best available biological information and is made consistent with the requirements at 50 CFR § 23.61. In making this finding, the U.S. Fish and Wildlife Service (Service) reviewed the pending applications to import sport-hunted trophies of African elephants taken in Zambia in 2016 and 2017 for any new or additional information to consider. The Service also considered trade information, including trade demand, and other scientific management information available to the Service on the status and management of African elephant populations in Zambia.

This finding does not establish any conditions that must be satisfied for a permit to be granted. The Service monitors the status and management of African elephant populations in Zambia and retains discretion to replace this finding at any time when it no longer reflects the best available biological

information consistent with the requirements at 50 CFR § 23.61. In addition, this finding is subject to new analysis in the context of individual permit applications for import of sport-hunted trophies of African elephants taken in Zambia. The Service reviews and evaluates each individual application to determine whether it includes new or additional information regarding the status of elephants in Zambia such that the requirements of 50 CFR § 23.61 are satisfied. Each application for import also needs to meet all other applicable permitting requirements before it may be granted.

BASIS FOR ADVICE:

On July 23, 2012, we issued a General Advice on the import of sport-hunted trophies of African elephants from Zambia for the calendar year 2012. However, since the Government of Zambia suspended elephant hunting between 2013 and 2014, and we did not receive any application requests to import African elephant sport-hunted trophies taken in Zambia in 2015, we have not made findings for the import of sport-hunted elephant trophies from Zambia since 2012.

In 2015, the Service was informed that the Government of Zambia planned to lift the suspension of the elephant sport-hunting program in Zambia for 2015. On March 4, 2015, the Service sent a letter to the Zambia Wildlife Authority (ZAWA) seeking confirmation on whether Zambia had decided to open a sport-hunting season for elephants in 2015, and if so, asking Zambia to please provide the information we requested to assist us in making our required findings. On April 30, 2015, we received a response from ZAWA to our March 4, 2015, letter, which noted the conclusion and adoption of the National Policy and Action Plan on Elephant Management in Zambia and Management Plan, the rationale for the suspension of the elephant sport-hunting program in Zambia from 2013 to 2014, and the 2015 elephant sport-hunting quota declared to CITES (ZAWA *pers comm.* 2015). In addition, Zambia provided a copy of their "Enhancement and Non Detriment Findings for African Elephant Sport Hunting in Zambia (March 2015)," as well as a document regarding their "Response to USFWS/EU Questions on Zambian Elephant Hunting 2015" to address the questions we posed in our March 4, 2015, letter.

On December 22, 2015, ZAWA sent the Service additional information regarding African elephants in Zambia, including the following documents:

- Possible Explanation for the Elephant Increase in the Kafue Area;
- Revised version (July 2015) of the "Enhancement and Non Detriment Findings for African Elephant Sport Hunting in Zambia;"
- Preliminary Report of the Dry Season Survey of Large Herbivores for Kafue and Luangwa Ecosystems (2013); and
- 65th CITES Standing Committee Meeting Summary – 7 to 11 July, 2014.

In February 2017, the Service hand-delivered a letter to a Department of National Parks and Wildlife (DNPW) official dated January 30, 2017, requesting any new and updated information regarding the management and conservation of elephants in Zambia, including information concerning the distribution, status and trends of African elephant populations in Zambia, and the sustainability of offtake. On March 31, 2017, the Service received a response from DNPW to the

questions outlined in our January 30, 2017, letter, as well as information regarding their 2016 Non-Resident Hunting Quota.

We also received additional information from other sources, all of which is referenced within the text of this document. The new information received from the Government of Zambia and other sources are discussed below as they relate to our finding for sport-hunted trophies of African elephants taken in Zambia in the calendar years 2016 and 2017.

Conservation and Management

1. African elephants are distributed in seven sub-regions throughout Zambia, including the Luangwa Valley, Mid/Lower Zambezi, Kafue, Mosi oa Tunya, Sioma - upper Zambezi, Bangweulu, Nsumbu – Mweru wa Ntipa, Lusenga – Tanganyika, and West Lunga (CoP15 Prop. 5). Zambia's CoP15 proposal notes that each sub-region exceeds 10,000 square kilometers (km^2) in area, and that the total area far exceeds 200,000 km^2. Zambia's Protected Area (PA) network covers 30% of the country (224,075 km^2) and currently falls under the responsibility of the Department of National Parks and Wildlife (DNPW). This includes 20 National Parks covering over 63,587 km^2 (28%) and 34 Game Management Areas (GMA) covering over 160,488 km^2, or 72% of the country's PA network (Nyirenda et al. 2008 and IUCN 1987, as cited in CoP15 Doc. 68 Annex 6b; Zambia Tourism 2017). Most GMAs are inhabited by rural farmers and either surround National Parks or are adjacent to them (CoP15 Doc. 68 Annex 6b). According to the Government of Zambia, "protected areas in Zambia are managed to ensure minimal disturbance and to ensure the maintenance of biodiversity through research and monitoring of key environmental parameters and the provision of security through anti-poaching work by wildlife protection units" (CoP15 Prop. 5).

2. In Zambia, the Ministry of Tourism and Arts has jurisdiction over its National Parks and wildlife (Ministry of Tourism and Arts 2017). The Zambia Wildlife Act No. 12 of 1998, which was the country's primary legislation for wildlife protection, established the Zambia Wildlife Authority (ZAWA) in 1999. ZAWA was responsible for establishing, controlling, and managing Zambia's National Parks and Game Management Areas (GMA), and for the licensing of hunting and control of the processing, sale, import, and export of wild animals and trophies (CoP15 Doc. 68 Annex 6b).

However, in 2015, the Government of Zambia decided to transform the wildlife sector due to operational challenges that ZAWA was facing (ZAWA *in litt.* 2015). As a result, the Zambia Wildlife Authority was disbanded in 2015 and reincorporated as a government department, the Department of National Parks and Wildlife (DNPW). The Government of Zambia also repealed Zambia Wildlife Act No. 12 of 1998, replacing it with Zambia Wildlife Act No. 14 of 2015, which established the Department of National Parks and Wildlife under the Ministry of Tourism and Arts, provided for the appointment of a Director and other officers responsible for National Parks and Wildlife, provided for the transfer of the functions of ZAWA to the Ministry of Tourism and Arts' Department of National Parks and Wildlife and its Director, as well as laid out the regulatory framework and legislation for the management and conservation of wildlife in Zambia (Parliament 2015; ZAWA *in litt.* 2015).

3. The Department of National Parks and Wildlife (DNPW) is responsible for the administration of Zambia Wildlife Act No. 14 of 2015 (Act). According to the Act (Parliament 2015), the functions of DNPW are to:

(a) control, manage, conserve, protect and administer National Parks, Community Partnership Parks, bird and wildlife sanctuaries and Game Management Areas and coordinate activities in these areas;
(b) in partnership with local communities, share the responsibilities of management in Community Partnership Parks and Game Management Areas;
(c) adopt methods to ensure the sustainability, conservation and preservation in the natural state of ecosystems and biological diversity in the National Parks, Community Partnerships Parks, bird and wildlife sanctuaries and Game Management Areas;
(d) encourage the general development of National Parks, Community Partnership Parks, bird and wildlife sanctuaries and Game Management Areas, including the development of facilities and amenities within these areas in accordance with the management plans for those areas;
(e) sensitize and educate the general public on the necessity of wildlife conservation and the importance of wildlife to foster appreciation of the economic and aesthetic value of wildlife as natural assets;
(f) undertake measures to ensure the proper balance between the sustainable use of wildlife and the management of ecosystems in National Parks, Community Partnership Parks, bird and wildlife sanctuaries and Game Management Areas;
(g) enhance the economic and social well-being of local communities in or around Community Partnership Parks and Game Management Areas;
(h) prepare and implement management plans for National Parks, Community Partnership Parks, bird and wildlife sanctuaries and Game Management Areas in consultation with relevant stakeholders;
(i) issue licenses, certificates and permits under this Act;
(j) in partnership with local communities, grant hunting concessions to hunting outfitters and non-consumptive tourism operators in Game Management Areas;
(k) assist and advise the boards in the management of human and natural resources in Game Management Areas and open areas which fall under their jurisdiction;
(l) formulate and advise the Minister on the regulations for the preparation and implementation of general management plans for National Parks, Community Partnership Parks, bird and wildlife sanctuaries and Game Management Areas;
(m) ensure the systematic management of financial, human and natural resources for wildlife conservation so that the abundance and diversity of species is maintained at optimum level;
(n) advise the Minister on the regulations required to conserve, protect and manage wildlife in National Parks, Community Partnership Parks, bird and wildlife sanctuaries, Game Management Areas, open areas and private wildlife estates;
(o) deposit revenue into a fund established by a board and regulate the use of the funds from profits accrued from the revenues payable under this Act in respect of licenses,

certificates and permits issued, hunting concessions granted and services rendered from the use of wildlife within an area of a board as the Minister may prescribe, in consultation with the Director;

(p) regulate trophy hunting operations and non-consumptive tourism operations in Game Management Areas;
(q) grant and regulate tourism block concessions in tourism blocks;
(r) cooperate with persons and organizations with an interest in the activities of the Department and are prepared to assist the Department on a voluntary basis and comply with the requirements set by the Ministry;
(s) regulate private wildlife estates;
(t) carry out commercial activities related to consumptive and non-consumptive tourism; and
(u) carry out any other activities relating to wildlife conservation and management that are necessary to the performance of its functions under this Act.

4. In 2005, Zambia produced a National Strategy for Elephant Management in Zambia, which established the following goal and objectives (CoP15 Doc. 68 Annex 6b):

> *Goal: "Conservation of elephants at population level which promote conservation of biodiversity while providing for sustainable utilization."*
>
> *Objective 1. To mitigate human – elephant conflicts*
> *Objective 2. To reduce poaching levels*
> *Objective 3. To establish and maintain a comprehensive ivory management system*
> *Objective 4. To provide for sustainable elephant utilization*

Management Plans for specific areas (e.g. Lower Zambezi) provide management objectives, activities, and guidelines (CoP15 Doc. 68 Annex 6b).

5. In 2015, ZAWA (*in litt.* 2015) identified the following actions they had implemented since the formulation of the national elephant conservation strategy, in order to achieve effective management of the African elephant:

> *Mitigate human – elephant conflicts*
>
> - ZAWA has developed land use plans in most Game Management Areas and National Parks. A few protected areas are remaining but efforts are being made to ensure that even in these areas Management Zone Plans could be developed so that there is a management guide. This has prevented human encroachment into wildlife areas and hence has reduced human–wildlife conflict.
> - In the event of elephant–human conflict, the area Warden is able to make a decision to control it without having to call headquarters. This has sped up reaction time and prevented damage to property and threat to human life. Camps and offices have been established in elephant conflict hot spots so that there is rapid response to situations. This has also built a positive image about ZAWA.
> - Ivory that is coming from GMAs and open areas is identified and labeled and stored in

the Ivory Strong room. Ivory from different mortalities is also categorized and labeled as such. This helps establish areas of frequent conflicts and management can be alerted about frequency of cases coming through.

- Revenue from the sale of ivory and other by-products obtained from elephant control operations in GMAs and open areas is shared with communities.
- ZAWA has initiated negotiations with the relevant individuals of the state responsible for resettlements so that where practicable, human settlements which have encroached upon or have taken away or altered elephant habitat or blocked elephant movement and migratory routes can be removed or alleviated in a humane and appropriate manner.
- ZAWA has also established a human–wildlife conflict resolution protocol which sets out procedures on how to monitor and document all elephant/human conflicts and effectiveness control measures.

Reduce poaching levels

- Conduct regular and consistent field patrols. Surveillance of protected areas has been increased in all elephant range protected areas: Luangwa, Kafue, Lower Zambezi, and the Sioma Ngwezi areas.
- Developed and implemented proactive law enforcement by using strike force units. This has been effective in the Kafue and Luangwa systems.
- Use specialized law enforcement techniques (ground-air communication, use of Global Positioning System (GPS) units, and night vision binoculars).
- Improved upon intelligence, surveillance, investigation and prosecution skills.
- Developed and implemented forensic techniques in examining elephant specimens to improve handling of court cases to deter potential poachers.
- Improved local community involvement in co-management and benefit sharing.
- Strengthened use of informers.

Provide adequate trained personnel

- Recruited and trained additional law enforcement staff.
- Deployed optimum levels of personnel to maximize area coverage.
- Implemented in-service training to upgrade skills.

Secure and allocate adequate financial resources

- Secured Government financial support. Government has significantly supported ZAWA in obtaining funding so that it can be self-sustaining. It has also supported countrywide aerial surveys of the African elephant so that its status can be understood better.
- Opened an elephant conservation account and attracted funding. ZAWA has been using resources from safari hunting without distinguishing sources from different species. Protection has been on an ecosystem scale so that it is biodiversity that is ultimately protected. However, ZAWA is considering a mechanism of enhancing the protection of certain species, like lion and elephant, because of their status.
- Lobbied and prepared project proposals to cooperating partners for funding. ZAWA has

established an office that is solely for lobbying, writing of project proposals and formation of partnerships with non-governmental organizations (NGOs), private sector, universities and other relevant institutions in order to establish a larger constituency of supporters in conservation.

Establish and maintain a comprehensive ivory management system

- Constructed a modern ivory strong room.
- Procured equipment and facilities for an efficient ivory management system in compliance with CITES.
- Trained personnel in ivory management skills.
- Established and maintained a database.
- Conducted regular auditing of the stock.

Provide a favorable environment for resumption of sustainable elephant hunting

- Monitored elephant populations (including status, trends, sex ratios and age structure).
- Established a database for monitoring internal and external trade controls.
- Complied with CITES, where international trade is permissible.

Strengthen and maintain coordination of elephant conservation in transfrontier areas

- Harmonized land use practices, where possible.
- Participated in the establishment of cross-border/trans-frontier parks.
- Conducted joint elephant research and monitoring.
- Attended consultative meetings through the diplomatic relations, agreements, and protocols.
- Strengthened links with the International Police Organization (INTERPOL) for intelligence information sharing and monitoring of illegal trade between countries, and ensured elephant surveillance throughout its range in the sub region.

6. In 2017, DNPW (*in litt.* 2017) acknowledged further implementation with regard to the National Strategy for Elephant Management in Zambia, including the following actions:

1) A central strong room for ivory stockpiles was built. An Ivory Management System has been put in place – which includes management of ivory stockpiles. The ivory database and comprehensive auditing system have been established. The ivory movement system from source to headquarters has also been put in place. Accountable documents for ivory movement systems have been developed. The ivory stockpile includes identified ivory from the following sources:
    - Natural mortality;
    - Problem animal control;
    - Law enforcement/recovered from poachers;
    - Collected from wildlife estate and/or natural breakage; and
    - Unknown origin, including ivory from other countries,

    as well as coordinates of the source where the mortality or ivory was collected.

2) DNPW monitors collection, registration, weighing and storage of ivory in accordance with the standards recommended by CITES Resolution Conf. 10.9 on *Consideration of proposals for the transfer of African elephant populations from Appendix I to Appendix II.*
3) Monitoring the Illegal Killing of Elephants (MIKE) has been implemented. In addition, the Spatial Monitoring and Reporting Tool (SMART) system is being rolled out across Protected Areas.
4) Coordination of elephant management in Transfrontier Areas - a corridor management strategy has been developed.
5) Implementation of CITES rules and regulations on elephants.
6) Improvement of funding. The Government of Zambia now pays DNPW staff salaries while allowing DNPW to retain all of its revenue, as outlined in the approved annual budget. This increases the amount of resources available for anti-poaching activities.

7. According to DNPW (*in litt.* 2017), although the 2005 National Strategy for Elephant Management in Zambia (Strategy) expired in 2012, the government still implements most of the strategies identified in the plan. However, the Strategy is scheduled for review this year (i.e. 2017). A consultant has since been engaged to facilitate this process, with support from the World Wide Fund for Nature (WWF; known as "World Wildlife Fund" in the United States) and The Nature Conservancy (TNC) (DNPW *in litt.* 2017).

8. In Zambia, the management and sport hunting of elephants is currently regulated by the Zambia Wildlife (Elephant Sport Hunting) Regulations, 2010 (Statutory Instrument No. 107 of 2010); the Zambia Wildlife (International Trade in Endangered Species of Wild Fauna and Flora) Regulations, 2007 (Statutory Instrument No. 61 of 2007), and the relevant provisions of Zambia Wildlife Act No. 14 of 2015 (DNPW *in litt.* 2017). These regulations prescribe rules for sport hunting of elephants; establish the hunting season, minimum trophy size, annual quota, post-hunt reporting, trophy registration, marking, export, and revenue sharing; place restrictions on international trade in endangered species; and provide the mechanism for Zambia's implementation of CITES (Government of Zambia 2007; Government of Zambia 2010; Parliament 2015). However, the Department of National Parks and Wildlife has submitted a revised Statutory Instrument on Elephant Sport Hunting to the Ministry of Justice for finalization, in light of the transformation of wildlife management in Zambia (i.e. the disbanding of ZAWA and creation of DNPW). According to DNPW (*in litt.* 2017), once the draft Statutory Instrument is finalized, the document will be made available to the Service.

9. A Fund is operational in Zambia whereby income from elephant trophy hunting is deposited and then distributed as follows (DNPW *in litt.* 2017):

Animal fees are shared
- 5% of the funds go to the Community Resource Board (CRB) patron (traditional leader or Chief);
- 45% of the funds go to the CRB in the form of community funds; and
- 50% of the funds go to DNPW in the form of conservation funds.

Concession fees are shared

- 5% of the funds go to the CRB patron (traditional leader or Chief);
- 15% of the funds go to the CRB in the form of community funds; and
- 80% of the funds go to DNPW in the form of conservation funds.

According to Zambia's "Guideline on the Use of Community Funds Accrued from Wildlife Management," the community funds are utilized as follows (DNPW *in litt.* 2017):

- 45% of the funds go to wildlife management, including resource protection and escort services;
- 35% of the funds go to community projects such as construction of clinics, roads, schools, and wells; and
- 20% of the funds go to administration of the CRBs.

10. In 2013 and 2014, Zambia decided to close its elephant hunting season because the Zambian government was interested in ascertaining the status of wildlife populations in the Game Management Areas where hunting occurs (ZAWA *pers. comm.* 2015). The government wanted empirical evidence on the population of Zambian animal species, particularly elephants and cats, before awarding the new ten-year hunting concessions to safari operators in the 23 hunting blocks where concessions had expired. To that effect, the government partnered with cooperating partners to undertake a survey in key elephant range areas. According to the Zambian government, results of the survey indicated that it was "safe for Zambia to continue elephant hunting" (ZAWA *in litt.* 2015). As a result, the Government of Zambia decided to reopen elephant sport hunting in 2015 and thus, issued a quota for the 2015 elephant hunting season.

Population Status and Trends

11. The first country-wide population survey of elephants in Zambia was conducted in 2008. In this survey, both stratified sample and total counts (Norton-Griffiths 1978, as cited in CoP15 Doc. 68 Annex 6b) estimated that the elephant population comprised 26,382 ± 4,405 (95% Confidence Limit (CL)) individuals over 166,713 km^2, which is approximately 70% of the protected area network (Simukonda 2009, as cited in CoP15 Doc. 68 Annex 6b). Due to time and funding constraints, the survey did not cover West Lunga (CoP15 Doc. 68 Annex 6b).

12. In 2010, the Panel of Experts noted that according to the African Elephant Database in 1995, 1998, 2002 and 2007 (Said et al. 1995, Barnes et al. 1998, and Blanc et al. 2002, as cited in CoP15 Doc. 68 Annex 6b; Blanc et al. 2007), total population estimates for elephants in Zambia indicated a population that was between a minimum of 16,562 definite elephants and a maximum of 29,229 elephants (the sum of probable, possible and speculative estimates) and did not indicate a clear overall population trend. The Panel pointed out, however, that the 2008 estimate of approximately 26,000 elephants was the highest figure reported to date over this period. Based on this information, the Panel of Experts concluded, at that time, that the African elephant population in Zambia could be considered stable and viable (especially the Luangwa and Kafue subpopulations),

and possibly increasing (CoP15 Doc. 68 Annex 6b).

13. In 2013, a countrywide survey was carried out, but the results were not released (Thouless et al. 2016).

14. In September 2015, an aerial survey of African elephants and other wildlife took place over the core elephant range, constituting four ecosystems in Zambia, as part of the continent-wide Great Elephant Census (GEC). A total area of 84,859 km^2 was sampled at an average intensity of 8% (DNPW 2016b). The four ecosystems where the survey took place were:

- Luangwa Ecosystem (32,819 km^2), comprising the North and South Luangwa, Luambe and Lukusuzi National Parks (NPs); and the Mukungule, Musalangu, Munyamadzi, Lumimba, Lupande and Sandwe Game Management Areas (GMAs);
- Kafue Ecosystem (45,030 km^2), comprising the Kafue NP and the 9 surrounding GMAs except Bbilili;
- Sioma Ngwezi Ecosystem (4,482 km^2), comprising the Sioma Ngwezi NP and the lower West Zambezi GMA; and
- Lower Zambezi Ecosystem (2,528 km^2), which is made up of Lower Zambezi NP, and Chiawa GMA.

Elephant range areas such as Nsumbu and West Lunga NPs, and surrounding GMAs were not included in the survey due to budgetary limitations (DNPW 2016b).

15. The following table summarizes the population estimates derived from the 2015 survey of these four ecosystems in Zambia.

Table 1: Summary of elephant population estimates in Zambia (From: DNPW 2016b)

Area	Population Estimate	95% Range
Kafue National Park	4,813	2,548 – 7,078
Kafue GMAs	1,876	262 – 3,490
Sub-total Kafue Ecosystem	*6,688*	*3,945 – 9,432*
South Luangwa National Park	3,302	2,108 – 4,496
North Luangwa National Park	4,673	2,885 – 6,461
Luambe National Park	54	6 – 131
Lukusuzi National Park	0	-
Luangwa Game Management Areas	5,869	2,761 – 8,976
Sub-total Luangwa Ecosystem	*13,898*	*10,343 – 17,454*
Sioma Ngwezi National Park	*48*	*6 - 126*
Lower Zambezi National Park	973	384 -1,562
Lower Zambezi Game Management Areas	153	16 – 325
Sub-total Lower Zambezi Valley	*1,125*	*512 – 1,739*
Total (Overall Zambia Elephant Range)	**21,760**	**17,237 – 26,283**

Therefore, according to DNPW (2016b), the total African elephant population in Zambia is estimated at 21,760 ± 4,523 individuals. This number is very similar to the total population estimate given by Chase et al. (2016) of 21,759 ± 2,310 individuals, with a 95% Confidence Interval (CI) of 17,232 – 26,286 individuals, as well as the total population estimate provided in the 2016 IUCN African Elephant Status Report (Thouless et al. 2016):

> *The estimated number of elephants in areas surveyed in the last ten years in Zambia is 21,967 ± 4,703 at the time of the last survey for each area. There may be an additional 214 to 314 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 105,461 km^2, which is 62% of the estimated known and possible elephant range.*

According to DNPW (2016b), the current overall population estimate is "similar to the estimate of 26,382 ± 4,405 individuals obtained in the 2008 country-wide survey which statistically was not significantly different (t=2.4, p=0.015)." Thouless et al. (2016) agree that elephant numbers in Zambia "have changed little since the last [African Elephant Status Report] update [in 2006]." The main changes have been a reduction in guesses from isolated small populations such as West Lunga and Bangweulu, and a substantial reduction in the population number in Sioma Ngwezi National Park; however, this makes up a small proportion of the national population (Thouless et al. 2016).

16. Regarding population trends within specific ecosystems, DNPW (2016b) states that it is difficult to obtain strictly comparable data over the years, since not all of the reports indicate the details of the survey area (thus, there may be differences in coverage areas between various surveys). In addition, surveys were conducted in different seasons and the survey methods may vary. However, Table 2 below shows the elephant population estimates where DNPW considered the data to be "comparable."

Table 2. Estimates of Elephant Populations since 2003 (From: DNPW 2016b)

Year	Luangwa Ecosystem	Lower Zambezi NP	Kafue Ecosystem	Sioma Ngwezi NP
2003		1,347		
2004				899
2005		3,417		385
2006			4,273	
2008	12,352		3,455	
2009	18,211			
2011	11,095		3,715	
2013		1,795		133
2015	13,898	973	6,688	48

According to DNPW (2016b) and based on the data indicated above, the 2015 survey results indicate the following:

- Kafue Ecosystem – current estimates for the Kafue ecosystem as a whole are greater than previous estimates (since 2006).
- Luangwa Ecosystem – current estimates for the Luangwa ecosystem as a whole are greater than the previous estimate (in 2011), but comparable to the 2008 population estimate.
- Lower Zambezi NP – current estimate for the Lower Zambezi National Park is less than previous estimates (since 2005), but similar to the 2003 population estimate. DNPW (2016b) states that the system is open to elephant movement across the river from Zimbabwe, so population numbers could potentially change markedly from year to year.
- Sioma Ngwezi NP – current estimate for the Sioma Ngwezi National Park is less than previous estimates (since 2004). DNPW (2016b) states that the trend since 2004 has been "significantly ($p=0.015$) downwards with an exponential decline rate of -0.22."

17. Carcass ratios (the percentage of dead elephants observed during a survey count) are often used as an index of population growth rates, as ratios <8% are typical of stable or growing populations over the previous four years, while higher carcass ratios may indicate mortality in excess of births in the previous four years (Douglas-Hamilton and Burrill 1991). During the 2015 survey, a total of 1,029 elephant carcasses were recorded in Zambia, out of which only 8 were fresh (<1 month old) and 19 were recent carcasses (<1 year old) in the entire combined survey area (DNPW 2016b). The majority of the carcasses observed were older than 1 year. Specifically:

- In the Luangwa Valley Ecosystem overall, a carcass ratio of 1.2% was estimated, which is indicative of an increasing population (DNPW 2016b).
- The Kafue and Lower Zambezi Ecosystems had carcass ratios of 7.02% and 6.33% respectively, which indicate stable elephant populations which are on the "tipping point between population increase and decline" (DNPW 2016b). Most of the elephant carcasses observed in the Kafue and Lower Zambezi Ecosystems were older than one year and no fresh carcasses were seen during the survey, which indicate that the level of poaching or deaths of elephants occurring in these ecosystems prior to the survey was low (DNPW 2016b). However, there may be cause for some concern, given that the carcass ratio for Kafue National Park was 1% in 2008 and increased to 7% in 2015, despite the apparent stability of the population in that area (Thouless et al. 2016).
- A very high carcass ratio was calculated for the Sioma Ngwezi Ecosystem, which increased dramatically from 3% in 2008 to 85.5% in 2015 (DNPW 2016b; Thouless et al. 2016). The survey counted more carcasses than live elephants in both the National Park and GMA, and it was the only place where fresh carcasses were recorded. This ratio indicates either high levels of poaching and/or a seasonally varying population (Thouless et al. 2016), as elephants in Sioma Ngwezi regularly migrate into the neighboring countries of Namibia and Botswana during the dry season (Chase et al. 2013, as cited in Thouless et al. 2016; DNPW 2016b). Most of the carcasses were older than 1 year and the number of total carcasses counted was similar to that estimated in 2013 (DNPW 2016b). Nevertheless, according to DNPW (2016b), the results "suggest a recent or ongoing problem of illegal hunting which has led to a loss of the original population." The survey results conclude

that the population of elephants in Sioma Ngwezi National Park is very unstable and rapidly declining (DNPW 2016b).

- An overall, countrywide carcass ratio of 4.52% observed during the 2015 GEC survey (Chase et al. 2016).
- The fresh-carcass ratio (carcasses <1 month old) observed during the 2015 GEC was 0.1% for Zambia overall (Chase et al. 2016).

18. Therefore, although it is unclear how comparable the data from previous surveys (since 2003) or the methods used in the previous countrywide survey, carried out in 2008, are to the 2015 survey (Thouless et al. 2016), the results show that, overall, the African elephant population in Zambia appears to be stable, but with large differences between different parts of the country (Great Elephant Census 2016). With regards to live elephants, the data suggests that elephant numbers are stable (and may even be increasing) in the two largest elephant ecosystems in Zambia – Luangwa and Kafue, while the population of elephants in the Lower Zambezi appear to be declining. However, in Sioma Ngwezi National Park, on the border with Angola and Namibia, the elephant numbers are declining catastrophically.
The countrywide carcass ratio of 4.52% indicates that the observed deaths are within sustainable levels and that Zambia's overall elephant population appears to be stable, corroborating the live elephant counts. However, with an ecosystem carcass ratio of a staggering 85.5%, more efforts are needed to address the poaching crisis occurring in Sioma Ngwezi.

Sustainability of Offtake

19. In Zambia, African elephant deaths occur as a result of several factors, including: 1) natural mortality; 2) sport hunting; 3) problem animal control (defense of human life and property); and 4) poaching. In order to evaluate whether offtake from sport (trophy) hunting is sustainable, all losses to the African elephant population must be considered.

20. In 2010, the Panel of Experts (CoP15 Doc. 68 Annex 6b) evaluated the sustainability of the total levels of offtake from the elephant population in Zambia. At the time of the Panel's analysis, the overall level of elephant offtake from all legal and illegal causes was estimated to have been a minimum of 208 annually (66 problem animal control (PAC) operations + 47 natural mortalities + 16 unknown + 20 sport-hunting quota + 59 poached), which is equivalent to 0.8% of the 2008 elephant population estimate (26,382 individuals). The Panel noted that even if this value were substantially increased, allowing for undetected natural mortalities and poached elephants, it would still fall within the expected rate of increase of the elephant population (approximately 3 - 5% annually). Therefore, the Panel concluded, at that time, that the overall elephant offtake could be considered as sustainable at the national level, especially given the seemingly stable and possibly increasing overall elephant population since 2002. The Panel of Experts noted that on a regional level, the offtake data indicate a likely decline in the Lower Zambezi, where the 2008 census confirmed both a population decline since 2005 and the highest carcass ratio in the country. The Panel of Experts further noted that levels of illegal activity in the Lower Zambezi needed to be reduced as a first priority (CoP15 Doc. 68 Annex 6b).

21. The Panel of Experts also evaluated the sustainability of legal sport-hunting. An annual CITES national export quota of 20 animals was maintained from 2005, when elephant sport-hunting began in Zambia, through 2010. The CITES export quota was increased to 80 animals for the 2011 and 2012 hunting seasons. The Panel of experts' analysis took into account a potential increase in the sport-hunting quota to 120 animals, as proposed in Zambia's CoP15 proposal. By examining data from the ivory management database, the Panel's analysis also took into account the number of trophy-quality males removed from the population by other causes. In total, the Panel considered a potential total offtake of 131 trophy-quality animals a year, which is equivalent to 0.5% of the 2008 total elephant population estimate. The Panel concluded that this level falls within the range 0.5 - 1% that is widely considered to be the limit to sustainable hunting of trophy-quality males in a healthy elephant population (Martin 1986).

22. The Panel of Experts also assessed whether the hunting of trophy quality males in Zambia was sustainable. The Panel's analysis of ZAWA records showed a steady decline in average tusk weight from 23.1 kilograms (kg) in 2005 to 19.6 kg in 2009. As such, the Panel raised some concern that 2009 trophies are the smallest on record in terms of maximum weight, average weight and length, despite being above (on average) the minimum legal requirements. While the Panel concluded that the legal hunting of trophy quality males is sustainable, it underscored the importance of ongoing monitoring of trophy quality, especially in locations where illegal offtake is relatively high. The Panel also noted that the accumulation of 112 trophy-quality tusks from natural mortality, PAC, and confiscations from 2005 to 2009 represented a large increase from 68 during the years 2000 - 2004 and that this highlights why such offtake should be factored into quota setting (CoP15 Doc. 68 Annex 6b).

Legal Offtake

23. In Zambia, elephant sport hunting begins on May 1st and ends on December 31st (Government of Zambia 2010).

24. In 2015 and 2016, Zambia's annual CITES export quota was set at 160 tusks (80 individuals), which was the same export quota that was set by Zambia for 2011 and 2012. There was no export quota declared to CITES by Zambia for "tusks and other trophies" of African elephants for 2013 and 2014 (CITES 2017), since Zambia decided to temporarily close its elephant hunting season during this time. Each year, the Government of Zambia (2010) also issues a "quota of elephants allocated for sport [hunting that] shall not exceed the [export] quota of elephants notified to the Secretariat of the Convention [on International Trade in Endangered Species of Wild Fauna and Flora] in any one year." This is not an additional quota, it is simply a subset of the annual export quota Zambia declares to CITES each year.

25. Information about the annual quotas, as well as the results of the 2015 and 2016 African elephant hunting seasons in Zambia are shown in Table 3. A total of 15 elephants were harvested between 2015 and 2016, and only male elephants were harvested from these hunts (DNPW *in litt.*

2017).

Table 3. Summary of Elephant Harvest in Zambia 2015-2016 (From: ZAWA *in litt.* 2015; ZAWA *pers. comm.* 2015; DNPW 2016a; DNPW *in litt.* 2017)

Year	Annual Export Quota (individuals)	Government Allocated Hunting Quota (individuals)	Elephants Harvested (individuals)	Location of Harvest (quantity)
2015	80 (160 tusks)	36	3	Lower Lupande (2); Munyamadzi (1)
2016	80 (160 tusks)	30	12	Chiawa (2); Luawata (2); Chikwa (2); Chifunda (1); Nyaminga (1); Nyampala (1); Nyakolwe (1); Nyamvu (1); Mwanya (1)

For 2017, Zambia's export quota has remained at 80 individuals (160 tusks), with the 2017 sport hunting quota set at 30 individuals (DNPW *in litt.* 2017).

26. In Zambia, wildlife is conserved in National Parks, Game Management Areas (GMAs), Open Areas, and Private Wildlife Estates such as ranches. National Parks are exclusively for wildlife habitation, with the exception of tourist lodges and camps, and is exclusively for non-consumptive use. Game Management Areas are multiple use areas buffering the National Parks where humans and wildlife co-exist, while Open Areas are areas for human habitation but wildlife can also exist there. Safari hunting is popular in hunting blocks falling within GMAs, since no consumptive wildlife use is permitted in the National Parks that border GMAs. Resident hunting takes place in both GMAs and Open Areas. Hunting activities also take place in private wildlife estates such as game ranches (ZAWA *in litt.* 2015).

27. According to DNPW (*in litt.* 2017), the open game ranches that participate in elephant sport hunting are located in the Luangwa Valley east of West Petauke GMA. Only hunting blocks located in the Luangwa and Zambezi Valleys are allocated elephants to hunt (DNPW *in litt.* 2017; DNPW 2016a; Protected Planet 2017; Steyn 2014; Kafue River Trust 2017; Anderson et al. 2013; Hunting Report 2013; Wes Hixon's Outdoor Adventures 2016). Each hunting block is allocated only one sport-hunted elephant per year, but may be allowed to hunt a second one if another hunting block within the same ecosystem voluntarily forfeits its elephant quota (this ensures that the total quota is not exceeded) (DNPW *in litt.* 2017). There are no hunting blocks or game ranches located around Siomi Ngwezi NP (where the population has severely declined) that are open to elephant sport hunting.

28. The Government of Zambia sets the sport hunting quota based on the population size, distribution, trophy quality, occurrence of human-elephant conflict, and demand from the community or outfitter. According to DNPW (*in litt.* 2017), the quota "does not exceed 1% of the total elephant population and is always far below the export limit of 80 [individuals]."

29. As mentioned above, trophy quality measurements are used as part of the data set to determine quotas. According to DNPW (*in litt.* 2017), this has been made strict by insisting that hunters only harvest individuals with tusks weighing above 15 kg. Hunters who harvest underweight ivory are penalized (DNPW *in litt.* 2017). ZAWA reported a slight improvement in trophy quality from 17 kg in 2011 to 17.2 kg in 2012 (ZAWA 2015). An analysis performed by DNPW (*in litt.* 2017) of trophy quality of sport-hunted elephants taken in Zambia between 2015 and 2016 showed that the average trophy weight during this period was 19.2 kg. According to DNPW (*in litt.* 2017), "there has not been much change [in trophy weight] in the past 10 years (i.e. 2005 to 2013), which had an average [trophy weight] of 19.21 kg."

30. Elephants killed as a result of conflict between humans and elephants (HEC) are not included in the sport hunting quota allocated by the Government of Zambia each year (ZAWA *in litt.* 2015), because the occurrence of HEC, by and large, does not coincide with hunting by potential clients (DNPW *in litt.* 2017). A summary of human-elephant conflicts in Zambia between 2012 and 2016 is shown in Table 4.

Table 4. Summary of Human-Elephant Conflicts in Zambia (From: ZAWA *in litt.* 2015; DNPW *in litt.* 2017)

Year	Reports of Problem Elephants	Problem Elephants Killed
2012	1,780	25
2013	2,405	20
2014	1,269	27
2015	-	10
2016	-	16

- No information on "Reports of Problem Elephants" was provided by DNPW for 2015 and 2016

Therefore, based on data recorded for the most recent five-year period (2012-2016), it is estimated that an average of 20 elephants are killed annually as a result of conflict with humans.

31. Current records of natural mortalities in Zambia are not available. However, in 2010, based on the accumulation rate of ivory from natural mortalities and breakages known from the ivory management database, the Panel of Experts estimated that on average, the tusks from at least 47 elephants were recovered annually between 2005 and 2009 (plus an additional 16 of unknown origin) (CoP15 Doc. 68 Annex 6b). This figure for annual natural mortality may be outdated; however, given that the current African elephant population estimate is similar to the estimate obtained in 2008 and that, overall, the African elephant population in Zambia appears to be stable, it is the best estimate we have available for Zambia at this time.

32. Based on a sport hunting quota of 30 African elephants, as well as the estimates cited earlier for natural mortality and problem animal control in Zambia, the overall legal offtake of African elephants in Zambia is estimated to be about 113 elephants annually. Considering the current population estimate to be 21,760 elephants, the legal annual offtake would be estimated at about

0.5% of the population. Even if the sport hunting quota allocated by the Government of Zambia matched the export quota of 80 (individuals) declared to CITES, the overall legal offtake of African elephants in Zambia would be estimated to be about 163 elephants annually. Given the current population estimate, the legal annual offtake would then be estimated at about 0.8% of the population. In both scenarios, the figure is less than the annual population growth rate of 3 - 5% and this, in itself would be considered sustainable; however, sustainability is measured against total offtake, including illegal offtake, discussed below.

Illegal Offtake

33. Updates concerning the CITES programs known as Monitoring the Illegal Killing of Elephants (MIKE) and the Elephant Trade Information System (ETIS) were presented at the 17th Meeting of the Conference of the Parties to CITES (CoP17; Johannesburg, September-October 2016).

The ETIS Report presented at CoP17, stated the following (CoP17 Doc. 57.6 (Rev. 1)), with regard to the group of countries of which Zambia was included:

- Falling in the middle in terms of the mean number of seizures, and showing a low mean weight value, this grouping is not particularly noteworthy. Further, none of the seizures have involved large ivory consignments of 800 kg or more so there is little to suggest active organized criminal activity. Assessing governance, the mean rule of law measure shows a negative value which could signal corruption problems, but the very high law enforcement effort ratio seems to indicate generally good performance where ivory trade is concerned. Finally, with a very low market score, this group of countries does not appear to play an obvious problematic role at the retail level.
- In 2014, Zambia was one of only twelve Parties that submitted ivory stock reports with inventory figures. Further, only Germany and Zambia provided information on privately-owned stocks.

34. The CITES MIKE Programme is a site-based system to monitor elephant population trends and the illegal killing of elephants. The MIKE Programme operates in some 60 sites in 30 range states of the African elephant and in 27 sites in 13 range states of the Asian elephant. In Zambia, there is one MIKE site – South Luangwa National Park.

Below is a summary of the carcasses reported to the MIKE Programme between 2002 and 2015 from the one MIKE site (South Luangwa) in Zambia, as well as the Proportion of Illegally Killed Elephants (PIKE) values calculated for each year. A PIKE level of 0.5 or higher translates to a level of illegal annual offtake that is likely to be higher than the annual natural birth rate, indicating that the elephant populations are very likely to be in net decline (CoP16 Doc. 53.1).

Table 5: Carcasses reported to the MIKE Programme from South Luangwa MIKE Site (Zambia): 2002 - 2015 (From: CITES MIKE Programme 2017)

Year	Total number of elephant carcasses	Number of illegally killed elephant carcasses encountered	PIKE Value
2002	4	1	0.25
2003	8	5	0.63
2004	23	15	0.65
2005	4	1	0.25
2006	35	27	0.77
2007	11	0	0
2008	8	7	0.88
2009	14	6	0.43
2010	49	26	0.53
2011	22	14	0.64
2012	34	14	0.41
2013	21	15	0.71
2014	77	41	0.53
2015	83	46	0.55

35. Overall, between 2012 and 2014, 381 elephants were killed illegally across the country (110, 135 and 136 elephants were poached in the years 2012, 2013 and 2014 respectively) (ZAWA *in litt.* 2015). In 2015, 168 elephants were reported to have been poached, with 155 elephants illegally killed in 2016 (DNPW *in litt.* 2017). Therefore, based on data recorded for the most recent five-year period (2012-2016), it is estimated that an average of 141 elephants are illegally killed (poached) each year. Moreover, according to DNPW (*in litt.* 2017), a total of 50 fresh and 22 recent carcasses were recorded in National Parks and GMAs across the country in recent patrols.

36. DNPW (*in litt.* 2017) has reported that poaching of elephants has been recorded in Lower Zambezi, Sioma, South Luangwa, Lukusuzi and Kafue National Parks, and in Game Management Areas such as Rufunsa, Chiawa, West Petauke and Mulobezi.

37. To address the declines in elephant numbers and the ongoing poaching crisis in some areas, especially in Sioma Ngwezi, DNPW is working with partners that include the Security agencies and NGOs to improve anti-poaching efforts, especially in Lower Zambezi and Sioma Ngwezi National Parks. For example, with assistance from WWF and the Peace Parks Foundation (PPF), the Government of Zambia has built new housing for rangers and recruited an additional 30 rangers in Sioma Ngwezi National Park. The Government of Zambia has also approved projects by WWF and PPF under the Kavango-Zambezi Transfrontier Conservation Area (KAZA TFCA) that will see increased funding to support law enforcement activities in Sioma Ngwezi National Park (DNPW *in litt.* 2017).

38. According to DNPW (*in litt.* 2017), the Government of Zambia is committed to combating poaching and to ensure that positive population growth is recorded in all wildlife protected areas. The Government of Zambia, through DNPW, is in the process of starting to revise its elephant conservation strategy with a special focus on those areas that recorded declines in elephant numbers, as well as combating elephant poaching and illegal ivory trade (DNPW *in litt.* 2017). The plan will also look at how to galvanize private sector and NGO participation in elephant protection, especially in Lower Zambezi and Sioma Ngwezi National Parks (DNPW *in litt.* 2017). The elephant conservation strategy is being revised with technical assistance from WWF and TNC in a participatory manner with input from stakeholders that include photographic operators, outfitters, conservation NGOs, the African Elephant Specialist Group, experts, academia, community and other government departments (DNPW *in litt.* 2017).

39. In addition, the Government of Zambia is addressing issues of poaching through other mechanisms. For example, a presidential order was given to all government security agencies to participate in combating wildlife crimes in Zambia (DNPW *in litt.* 2017). To this effect a taskforce was formed which includes the Zambia Army, Air Force, National Service, Police, Intelligence, and the Department of National Parks and Wildlife. DNPW (*in litt.* 2017) states that the level of effort from the Government of Zambia to curb poaching has increased with the issuance of the presidential order, which has contributed to an increase in the number of man-days spent on patrol and the number of arrests of offenders.

40. In 2013 and 2014, law enforcement efforts resulted in the encounter and subsequent arrests of 1,671 and 1,912 suspects from the field respectively (ZAWA 2015). The increase in the number of arrests thus resulted in increased forfeitures and recoveries of items used for illegal purposes. In 2014, 580 firearms were recovered; this is the main weapon used against elephants by poachers in Zambia (ZAWA 2015). In addition, 135 pieces of ivory were recovered in 2013, while 226 pieces of ivory were recovered in 2014 (ZAWA 2015). Table 6 summarizes the prosecution data reported for 2013 and 2014.

Table 6: Prosecution of Offenders for 2013 and 2014 (From: ZAWA 2015)

Description	2013	2014
Number of persons indicted	1,323	1,607
Number convicted	1,338	1,316
Number of individuals fined	465	749
Amount realized from fines imposed on convicts in Zambia (K=Kwacha)	K766,207	K1,053,826

41. According to DNPW (*in litt.* 2017), the Government of Zambia currently allocates about K40million (approximately USD4.4 million) to DNPW annually, of which 75% is used for anti-poaching.

Sustainability of All Offtake

42. In order to evaluate whether offtake from trophy hunting is sustainable, all losses to the African elephant population, including illegal offtake, must be considered. Given the data presented above, the overall level of elephant offtake from all legal and illegal causes is currently estimated to be about 254 elephants annually (20 problem animal control operations + 47 natural mortalities + 16 unknown + 30 sport hunting quota + 141 illegally killed (poached)), which is equivalent to 1% of the current elephant population estimate (21,760 individuals). Just as the Panel of Experts noted in 2010, even if this value were substantially increased, allowing for undetected natural mortalities and poached elephants, or an increase in the sport hunting quota, it would still fall within the expected rate of increase of the elephant population (approximately 3 - 5% annually). Therefore, at this time, the overall elephant offtake can be considered as sustainable at the national level, especially given that the overall African elephant population in Zambia appears to have been stable since at least 2008.

Conclusion

43. Based on the information currently available and data the presented above, we believe that the status of the African elephant population in Zambia and the management efforts of the Government of Zambia are adequate to ensure that the sport hunting of African elephants does not adversely affect the status of the species in Zambia.

44. Overall, the current African elephant population in Zambia appears to be stable, with little change in elephant numbers in Zambia since 2006. However, the 2015 census highlighted some large differences between different parts of the country. Although the data suggests that elephant numbers are stable (and may even be increasing) in the two largest elephant ecosystems in Zambia – Luangwa and Kafue, the elephant numbers in Sioma Ngwezi National Park, which is a small portion (2%) of the national population, are declining catastrophically. The countrywide carcass ratio of 4.52% indicates that the observed deaths are within sustainable levels and that Zambia's overall elephant population appears to be stable, corroborating the live elephant counts. However, with an ecosystem carcass ratio of a staggering 85.5%, more efforts are needed to address the poaching crisis occurring in Sioma Ngwezi.

45. Since the formulation of the National Strategy for Elephant Management in Zambia in 2005, the Government of Zambia has implemented many of the actions identified in the Strategy in order to achieve effective management of the African elephant. Although the Strategy officially expired in 2012, the government still implements most of the strategies identified in the plan. The Strategy is scheduled for review this year (i.e. 2017).

46. We commend Zambia for the transformation of the wildlife sector (with the creation of DNPW) due to the operational and financial challenges that ZAWA was facing, and for stabilizing and improving funding to the wildlife program. The Government of Zambia now pays DNPW staff salaries while allowing DNPW to retain all of its revenue, as outlined in the approved annual

budget. This increases the amount of resources available for anti-poaching activities.

47. Furthermore, we applaud Zambia for taking the step to temporarily suspend the elephant hunting season in 2013 and 2014, on their own, in order to ascertain the status of wildlife populations in the Game Management Areas where hunting occurs. The government wanted empirical evidence on the population of Zambian animal species, particularly elephants and cats, before awarding the new ten-year hunting concessions to safari operators in the 23 hunting blocks where concessions had expired. The Government of Zambia wanted to ensure that it was safe for the country to continue the sport hunting of elephants.

48. We have evaluated whether offtake from trophy hunting is sustainable, given all losses to the African elephant population in Zambia, including illegal offtake. Given the data presented above, the overall level of elephant offtake from all legal and illegal causes is currently estimated to be about 254 elephants annually, which is equivalent to 1% of the current elephant population estimate. Just as the Panel of Experts noted in 2010, even if this value were substantially increased, allowing for undetected natural mortalities and poached elephants, or an increase in the sport hunting quota, it would still fall within the expected annual population growth rate of 3 – 5 %. Therefore, at this time, the overall elephant offtake can be considered as sustainable at the national level, especially given that the overall African elephant population in Zambia appears to have been stable since at least 2008.

49. While poaching has had less of an impact on the overall elephant population in Zambia (Thouless et al. 2016), southwest Zambian elephant populations (i.e. Sioma Ngwezi) continue to experience losses due to poaching. Thus, we are encouraged by the Government of Zambia's continued work and commitment to combating poaching and to ensure that positive population growth is recorded in all wildlife protected areas. The Government of Zambia, through DNPW, is in the process of starting to revise its elephant conservation strategy with a special focus on those areas that recorded declines in elephant numbers, as well as combating elephant poaching and illegal ivory trade.

50. Therefore, we are able, at this time, to find that the importation of sport-hunted trophies of African elephants taken in Zambia in the calendar years 2016 and 2017 will be for purposes that are not detrimental to the survival of the species. However, we do have some concerns, noted below, that we would like to see Zambia address before we make our finding for the 2018 hunting season:

CONCERNS:

1) The Department of National Parks and Wildlife have notified us that they have submitted a revised Statutory Instrument on Elephant Sport Hunting to the Ministry of Justice for finalization, in light of the transformation of wildlife management in Zambia. DNPW has indicated that once the draft Statutory Instrument is finalized, the document will be made available to the Service. We await receipt of this revised Statutory Instrument on Elephant Sport Hunting from Zambia.

2) The 2005 National Strategy for Elephant Management in Zambia officially expired in 2012. Although the Government of Zambia still implements most of the strategies identified in the plan, the Strategy is scheduled for review this year. We strongly encourage Zambia to complete the review process and develop a new or revised Strategy. We would also like to request that Zambia provide us with a copy of the new or revised National Strategy for Elephant Management or Elephant Management Plan, once it is developed and finalized.

3) Given the possible decline in the Lower Zambezi elephant population and the drastic decline in the Sioma Ngwezi NP population (and an ecosystem carcass ratio of 85.5%), as well as a carcass ratio for Kafue National Park that increased from 1% in 2008 to 7% in 2015, we believe more effort is needed in these areas to address poaching, particularly in Sioma Ngwezi. Although we recognize that Zambia has greatly improved its anti-poaching activities, the levels of illegal activity need to be reduced as a first priority, and we will continue to monitor this situation.

4) In 2010, the Panel of Experts' analysis showed a steady decline in average tusk weight from 23.1 kg in 2005 to 19.6 kg in 2009. As such, the Panel raised some concern that the 2009 trophies were the smallest on record in terms of maximum weight, average weight and length, despite being above (on average) the minimum legal requirements. Then, in 2011 and 2012, the average trophy weight declined even further to 17 kg and 17.2 kg respectively. However, an analysis of trophy quality showed that the average trophy weight increased to 19.2 kg between 2015 and 2016. Although the further decline in trophy quality in 2011 and 2012 was very concerning, the increase in trophy quality in 2015 and 2016 is very promising and brings the current trophy quality level close to that of 2009. We would like to see the average tusk weight continue to increase and remain at a high level, and therefore, we encourage Zambia to continue to monitor trophy quality, especially in locations where illegal offtake is relatively high.

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FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
17US03370C/9

2. Valid
11/12/2018

3. Permittee (name and address, country)
ROBERT L HIXSON JR
(b) (6)
CARROLLTON, TX 75006
U.S.A.

4. Consignor (name and address, country)
MICHAEL W. BORMAN
BANGWEULU TAXIDERMY LTD
41421K CHIFWEMA ROAD
NEW KASAMA, LUSAKA PROVINCE
LUSAKA
ZAMBIA

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.

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 2016 HUNTING SEASON.

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

-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.

11/13/2017
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: 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.	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:

574680

Form 3-200-52

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

DEC 18 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

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Hixson	Robert	L	Jr

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)		(925) 417 5270	import@b.hunter-international.

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)
N/A	
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (include if different than mailing address; include name of contact person if applicable; include Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	**1.c. State**	**1.d. Zip code/Postal code**	**1.e. County/Province**	**1.f. Country**
Dallas	TX	75225		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

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Atty. In fact for Robert Hixson 12/06/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

HUNTER INT'L BROKERAGE SERVICES, INC
5700 Stoneridge Mall Road, Suite 260
Pleasanton, CA 94588

FEDEX RETURN LABEL ATTACHED

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Vanessa Tabugan Tel# (925) 417 5273 / E-mail: import@b.hunter-international.net

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: 18US03370C/9

5. Submit the original permit with this application. ATTACHED

6. **Past activities.** N/A

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.) N/A

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form. N/A

9. **Certification -** Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

      I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signature: _____ 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 may need to request additional information regarding the changes after reviewing your initial request.

      I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

   Permittee's signature: [signature] Atty In Fact for Robert Hixson Date: 12/06/2018

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

December 06, 2018

RE: AMENDMENT OF PERMIT # 18US03370C/9

Box# 3: Permittee (name and address, country)

From: Robert L Hixson Jr
(b) (6)

To: Robert L Hixson Jr
(b) (6)

Box# 4: Consignor (name and address, country)

From: Michael W. Borman
Bangweulu Taxidermy LTD
41421K Chifwema Road
New Kasama, Lusaka Province
ZAMBIA

To: Lifeform Taxidermy
7 Aluminium Road
Box 763
White River
SOUTH AFRICA

Thank you.

Vanessa Tabugan
Hunter International
Tel# (925) 417 5272
E-mail: import@b.hunter-international.net

PERMIT / CERTIFICATE 171139

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

- [ ] EXPORT
- [x] RE-EXPORT
- [ ] IMPORT
- [ ] OTHER

ORIGINAL

2. Valid until 30 Jan 2019

3. Importer (name and address)
(b) (6)

4. Exporter / Re-exporter (name, address and country)
Lufeform Taxidermy
7 Aluminium Road
Box 763
White River
SOUTH AFRICA

3a. Country of import USA

5. Special conditions: Invalid without Annexes (condition 1 on next page) Replaces permit 171109 dd. 11 July 2018, import permit 16715G dd. 19 Sept 2017
Issues: ZM 16/016/18, 9 CKT 2; ZM 16/015/16.7 CKT 1
USA Import 17US093370 C/9, dd. 11/12/2017
Skin panels cut in 5(five) pieces
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) H

5b. Security stamp No. 1663 1666

	7.a 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	Elephant *Loxodonta africana*	tusk pair/set/mounted	IW	2(two)	
	12. Country of origin* ZM	Permit No. 51273	Date 16/11/2017	12a. Country of last re-export / Certificate No.	Date
	12b. No. of the operation ** or date of acquisition ***				
B	Elephant *Loxodonta africana*	Skin panel leather tan	IW	5(five) pieces	
	12. Country of origin* ZM	Permit No. 51273	Date 16/11/2017	12a. Country of last re-export / Certificate No.	Date
	12b. No. of the operation ** or date of acquisition ***				
C	Elephant *Loxodonta africana*	s/c (1) forequarter from panel leather tan left & right ear back panel leather tan	IW	1(one) of each	
	12. Country of origin* ZM	Permit No. 51273	Date 16/11/2017	12a. Country of last re-export / Certificate No.	Date
	12b. No. of the operation ** or date of acquisition ***				
D	Elephant *Loxodonta africana*	s/feet four stools	IW	4(four)	
	12. Country of origin* ZM	Permit No. 51273	Date 16/11/2017	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: K.D Makaringe

Nelspruit
Place

31 July 2018
Date

1663-1666

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

Block	Quantity
A	
B	
C	
D	

15. Bill of Lading/Air Waybill Number:

Port of Export | Date | Signature | Official stamp and title

V & R Printing Works (Pty) Ltd (012) 333 2462 (2621)

PERMIT / CERTIFICATE 171139

Annexure B

CONDITIONS FOR PERMIT NO./s CITES: 171139..... 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 – 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.

MPUMALANGA TOURISM
2018 -07- 31
PERMITS

Signature of Issuing Officer	Date	Signature of Recipient	Date 3/8/18
DOROTHY MAKARINGE		Valerie Theunissen	
Full Name		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).

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
17US03370C/9

2. Valid
11/12/2018

3. Permittee (name and address, country)
ROBERT L HIXSON JR
(b) (6)
CARROLLTON, TX 75006
U.S.A.

4. Consignor (name and address, country)
MICHAEL W. BORMAN
BANGWEULU TAXIDERMY LTD
41421K CHIFWEMA ROAD
NEW KASAMA, LUSAKA PROVINCE
LUSAKA
ZAMBIA

Original, Unused Permit Returned

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.

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 2016 HUNTING SEASON.

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

-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.

11/13/2017
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 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.	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

574680

CUSTOMS POWER OF ATTORNEY

and

Acknowledgment of Terms and Conditions of Service

C# 11285

Social Security numb (b) (6)
Date of birth

Know all men by these presents: That, Robert L. Hixson, JR
(Full legal name of individual)

residing at (b) (6) Dallas, TX 75225
(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, 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 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 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 L. Hixson JR.

has caused these presents to be sealed and signed: (Signature) (b) (6)

(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
512/424-2600
EN ESPANOL 512/424-7181

9BDW0GA1 0016 015537
ROBERT LOUIS HIXSON JR
(b) (6)

Attached is your new driver license/identification card.

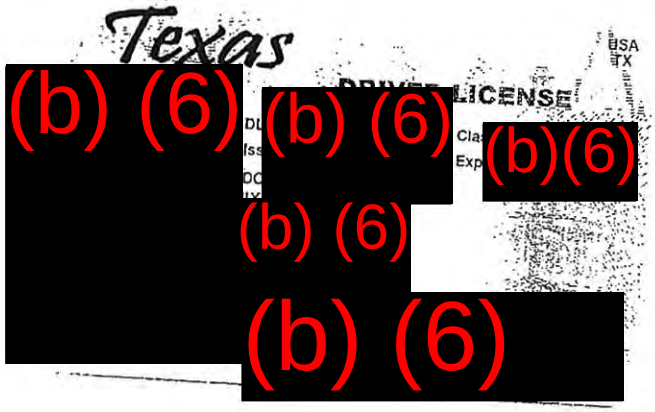
Please check your new attached card very carefully. If you find any errors, email DriverLicenseErrors@dps.texas.gov or call the Contact Center at (512) 424-2600. If there are no errors it is very important that you destroy your previous driver license or identification card. It is a violation of Texas 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
- Pay Driver Responsibility Program surcharges at www.txsurchargeonline.com
- Pay Driver License reinstatement fees at 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.joindps.com



Form 3-200-20

OMB Control No. 1018-009
Expires 08/31/202

RCVD DEC 18 2018

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Cleveland	William	Frances	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Hickory	Mississippi	39332	Newton	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and nd belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

9-5-18

ermit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

(b)(6) [redacted]

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Billy Cleveland (b)(6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   Loxodonta Africana (Tusk & skull) Bones, leather Male furniture

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   N/a.

   b. Date wildlife is to be hunted:

   N/a

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   N/a

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

   Mopani, Hoedspruit, South Africa Mpumulanga Province.

   b. Date wildlife was hunted:
   July 5, 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
Outfitter - John Luyt / Professional Hunter - John Luyt
Duke Safaris.

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:
Safari Taxidermy, 47 Gaud Street, Laboria
Polokwane, Limpopo 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). - As send

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: Mrs. Charlene du Toit
Business Name: Zingela forwarders.
Address: Unit 13, Brentwood Business Park, No 37 Rd 3, Brentwood P
City: Benoni
State/Province: Johannesburg
Country, Postal Code: 1501

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

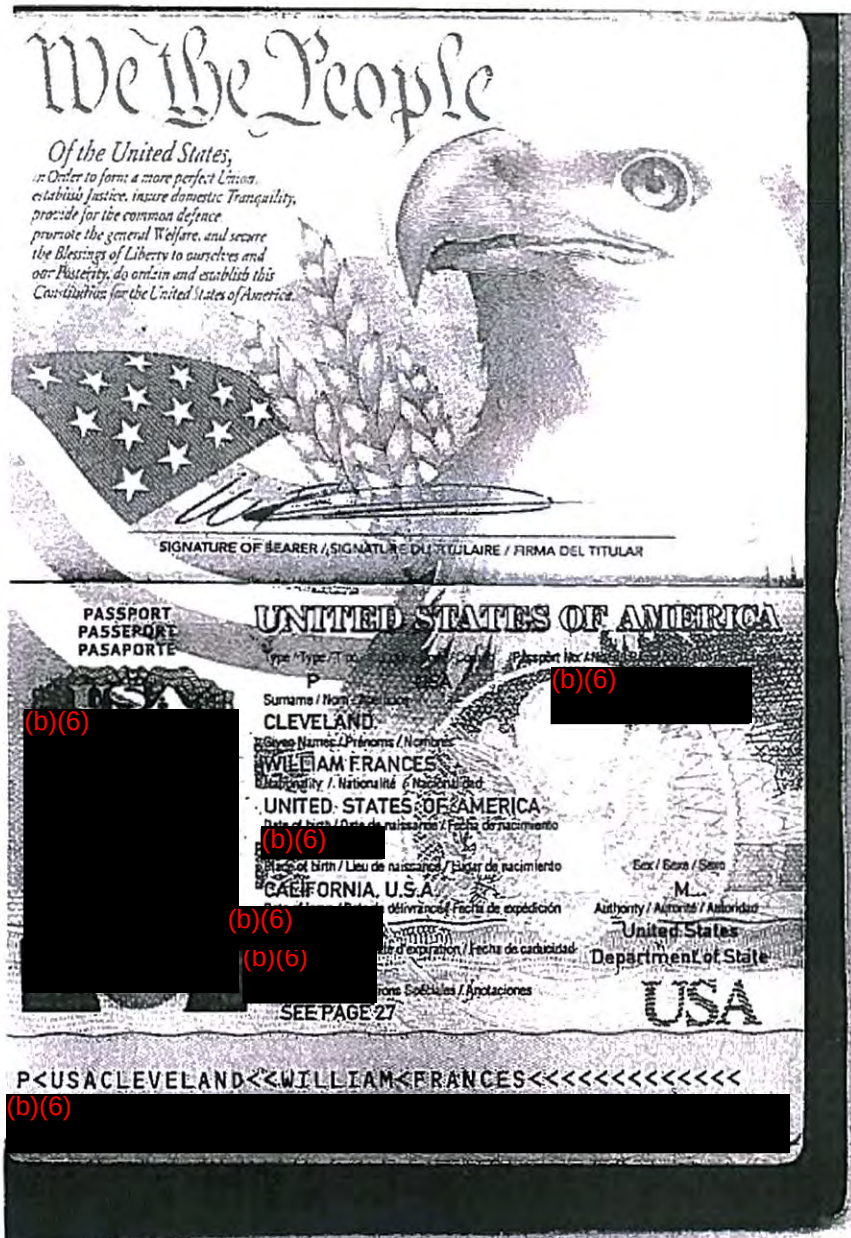
11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more

Applicant's signa (b) (6) Date: 9/5/18

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 governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from the list of designated ports. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).


We the People
Of the United States,
SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR
PASSPORT
PASSEPORT
PASAPORTE
UNITED STATES OF AMERICA
USA
(b)(6)
CLEVELAND
WILLIAM FRANCES
UNITED STATES OF AMERICA
(b)(6)
CALIFORNIA, U.S.A.
(b)(6)
(b)(6)
M
United States
Department of State
SEE PAGE 27
USA
P<USACLEVELAND<<WILLIAM<FRANCES<<<<<<<<<<<<
(b)(6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

DEC 1 6 2018

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
MIRO	JAVIER	E	MD

(b)(6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b)(6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
BAKERSFIELD	CA	93306	USA KERN	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the ***Title 50***, and I certify that the information submitted in this application for a permit is complete and and that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

12.03.2018

Signature pied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

N/A

2. Who should we contact
Rut Miro
Conservation Force, 504-83 (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.
   ELEFANT

   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:
   CHILANGA / RYAMPALA ZAMBIA
   MUNYAMADZI game management area

   b. Date wildlife was hunted: [illegible] - 01-10-2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Adam Bushe / Baobab Safaris
↓ ↓
Professional Hunter 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]:

LUSAKA, ZAMBIA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Baobab Safaris
Business Name:
Address: FREEDOM WAY CENTRE PLOT 133
City: LUSAKA 34272
State/Province:
Country, Postal Code: ZAMBIA 10101

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

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: _____ 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: 12-03-2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(Act No 12 of 1996)

STATUTORY INSTRUMENT No 107 OF 2010

Form ESI

The Zambia wildlife (Elephant)(Sport Hunting) Regulations,2010

SECTION A: Licensing details

Station of issue Chilanga Date of issue 24/09/18

Full Name Mr Javier Miro NRC/Passport No. (b)(6)

Postal Address Baobab Safaris

Residential Address USA

Non Resident Hunting License number ~~0001945~~ 0001053

Details of firearm (S): Firearm License No(s) 854

Calibre of firearm(s) 416 Rigby

SECTION B: Hunting Details

Date of Hunt 1/10/18 Name of Hunter Javier Miro

Hunting Block Nyampala Animal Sex male

	Tusk 1	Tusk2
Weight	24 Kgs	21.2 Kgs
Length	180 cm	164 cm
Special Mark(s)	-	-

SECTION C: conditions

1. This form shall be completed and submitted together with the ivory to the nearest Area Management Unit within 48hrs of the killing of the elephant.
2. The completed form shall move with the ivory until the certificate of ownership is issued to the holder of the license.
3. Any lose of form ESI prior to or after the hunting shall be reported to the Authority headquarters within 48hrs.

SECTION D: Declaration

I (Licensee) JAVIER E MIRO ...hereby declare that the above information is a true record of the animal(s) hunted in the Republic of Zambia.

Date 1-10-2018 Signature

I (ZAWA representative) DAVIES CHIKWANDA ...hereby declare that the above information is a true record of the animal(s) hunted by the licensee.

Date 1-10-2018 Signature

Original

NPW FORM 2

S/No 0001945

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue Chilanga Date of Issue 24/09/2018

DETAILS OF LICENSEE

Full Name Mr J Muna NRC No./Passport No.

Nationality Age

Tel/Mobile No E-mail

Full Name of Safari Company Baobab Safaris

Certificate of Incorporation No. Date of Incorporation

Postal Address Lusaka 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 US$*
Elephant	1	M	Nyampala 6000128 6043630	2018	

Total Animals fee in the Kwacha equivalent of
Concession Fees paid in the Kwacha equivalent of
Grand Total the kwacha equivalent of

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
24 SEP 2018
Official Stamp
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Chairperson of the Committee

Killed 1/10/18

Serial No 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0001053

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)
PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue 24/09/2018

DETAILS OF PERMIT HOLDER

Full name Javier Enrique Mira ..... NRC/Passport No (b)(6)

Tel Mobile No ..... E-mail address .....

Postal Address Baobab Safaris ..... Residential Address USA

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: 854 2. ..... 3. .....

Calibre(s) 1.: 416 2. ..... 3. .....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No..... 0001318

Hunting Type..... Non Resident

is hereby authorised to hunt in ..... Mwamadzi Game Management Area,

..... Nyampala Hunting block for ..... days from 26/09/18

to 11/10/2018 (Dates inclusive)

Amount Paid .....

GRZ Receipt No 043622

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
Official Stamp 24 SEP 2018
LICENSING
PRIVATE BAG 1 CHILANGA ZAMBIA.

Chairperson of the Committee

Note: Original copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

NPW FORM12

0002160

ORIGINAL

S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: Adam Burke NRC/Passport No. 905252/74/2

Residential Address: Santuree farm Chirundu

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: Baobab Safaris

DETAILS OF CLIENT

Name of client: Mr J Miro NRC/Passport No: (b)(6)

Tel/Mobile No..... Nationality: USA

Postal Address: Baobab Safaris Ltd Residential Address.....

Type of Licence: Non Resident Licence No. 0061053

Date of Issue: 24/9/18 Place of Issue. Lilongwe

Name of Hunting Block where hunting was conducted: Nyampala

Hunting period From 26/9/18 To 11/10/18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes ✓	No	[illegible]
11/10/18	Elephant	M	1			✓		0001945
4/10/18	Puku	M	1			✓		0002026
3/10/18	Bushbuck	M	1			✓		0007025
6/10/18	Buffalo	M	1			✓		0001946

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
Elephant		180cm		
Puku			18"	
Bushbuck			13"	
Buffalo			43"	

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date 10/10/18 Signature of Client.....

Date 10/10/18 Signature of Professional Hunter: Burke

Date 10/10/18 Name of Wildlife Police Officer DAVIES

Employment No. of W.P.O.....

Signature of W.P.O.....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

RCVD MAY 14 2018

RCVD MAY 14 2018

LL

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1 a. Last Name	1 b. First Name	1 c. Middle Name/Initial	1 d. Suffix
COLLIER	WILLIAM	C	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3 a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/Initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1 a. Physical address (Street address, Apartment #, Suite # or Room #; no P O Boxes)				
(b) (6)				
1 b. City	1 c. State	1 d. Zip code/Postal code	1 e. County/Province	1 f. Country
Virginia Beach	VA	23462		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.

(b) (6) (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

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.

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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 le

Applicant's signatur (b) (6) _____ 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 klipsringer 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 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

ZW 20172308 4

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

little

Specified officer's signature and date stamp

Cert. No 123803

Name WILLIAM COLLIER

(b) (6) [redacted]

Address CORPUS CHRISTI 78415

TEXAS USA

Tusk serial number	ZW 20172308 4
Tusk mass (kg)	16 Kg
Tusk length (metric)	126cm
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.

ZW 20172308 5

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

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Specified officer's signature and date stamp

Cert. No 123804

Name WILLIAM COLLIER

(b) (6) [redacted]

Address CORPUS CHRISTI 78415

TEXAS USA

Tusk serial number	ZW 20172308 5
Tusk mass (kg)	17 Kg
Tusk length (metric)	129cm
Sex	M

Authority TB 78722

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.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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	1.b First Name	1.c. Middle Name/Initial	1.d. Suffix
Lott	John	K	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax Identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Aspers	PA	17304	Adams	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/Prin(b) (6) d or stamped signatures) Date of signature (mm/dd/yyyy)

03/14/2018

e 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 K. Lott (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

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 Mulilo 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: Kappsfarm,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 Dzoti 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 zensus in the region, constant support and donation towards ongoing research in the region and enviormental 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: (b) (6) 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).

following certificate must be completed immediately after each animal that has been hunted (please print)

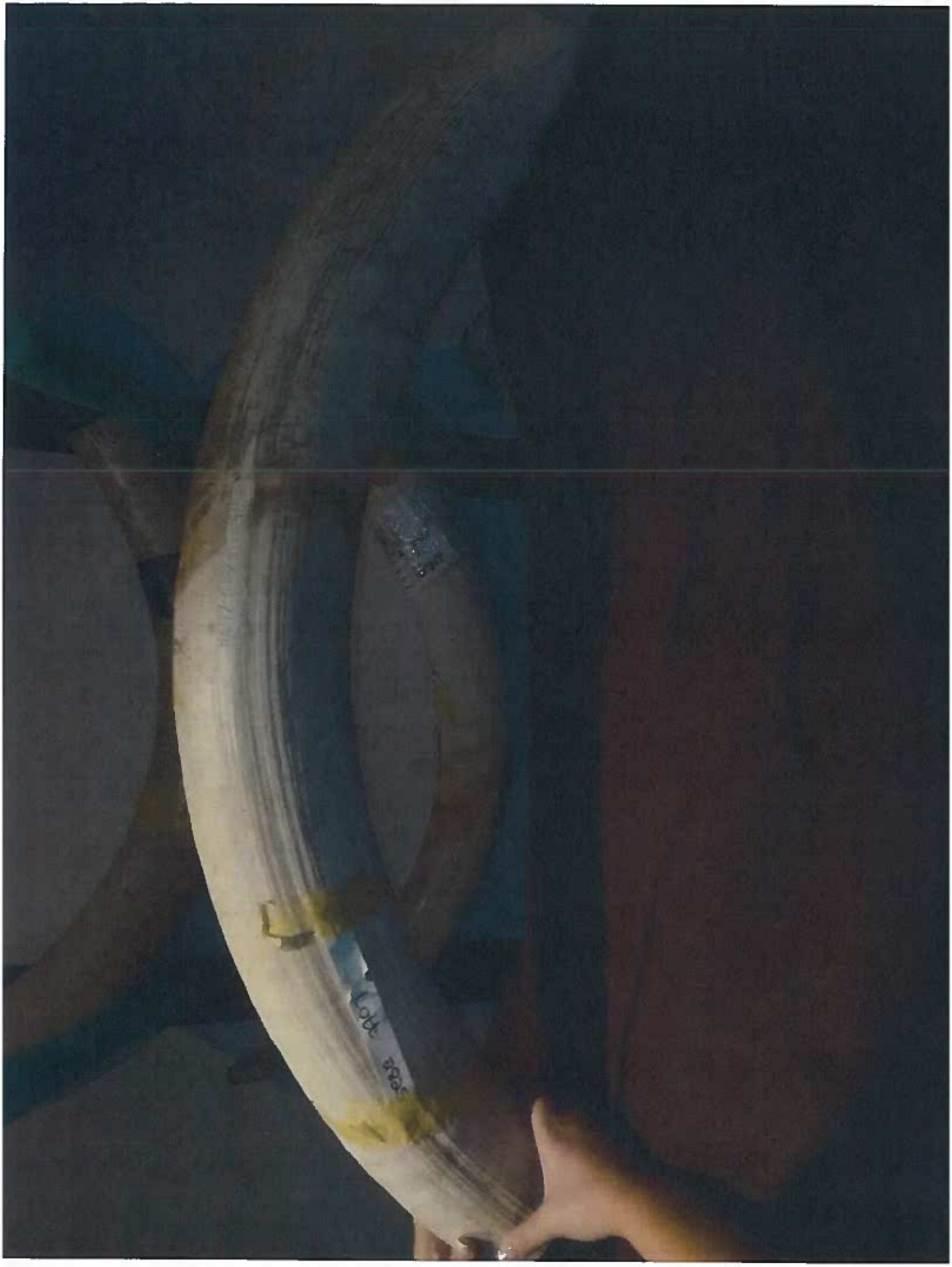
Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male Female	Farm Name	Farm No	Farm owner	Hunter	Professional hunt Master hunting gu Hunting guide
9/2017	Elephat							50	♂	Dzoti Conservancy		[redacted] (b) (6)		[redacted]
		Reported:				11/09/2017				08H 25		Riverbda.		

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 ma conduct the hunt.

(9) (b)
(9) (b)

NA 17 0029 1650

NA 17 0030 1890



Barry, Anna <anna_barry@fws.gov>

John K. Lott PRT #82846C

1 message

Barry, Anna <anna_barry@fws.gov> Mon, Jul 9, 2018 at 1:54 PM
To: (b) (6) [redacted]

Dear Mr. Lott,

The following is in response to your request regarding the status of your application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by-application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of sport-hunted African elephant and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is pending at this time.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT *You may have noticed that our* ***application forms expired 5/31/2017****. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

John K. Lott PRT #82846C

1 message

Barry, Anna <anna_barry@fws.gov> Mon, Jul 9, 2018 at 1:59 PM
To: (b) (6)

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Barry, Anna <anna_barry@fws.gov>

John K. Lott PRT #82846C

Barry, Anna <anna_barry@fws.gov> Tue, Jul 10, 2018 at 9:41 AM
To: (b) (6)

Dear Mr. Lott,

The following is in response to your request regarding the status of your application.

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species like the African elephant. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by-application basis.

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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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SHANE MAHONEY
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#a 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 (NACSO), 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^2 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

3240 South I-10 Service Road, West, Suite 200 • Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax: (504) 837-1145 • Email: jjj@conservationforce.org
http://www.conservationforce.org

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

Share / Save

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...

Website by JARO Consultancy

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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) [redacted]

Name: Lester Earl Bentz

Date: March 30, 2018

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

RCVD APR 16 2018

RCVD APR 16 2018

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
BENTZ	Lester	Earl	

(b) (6) [redacted]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, pro(b) (6) [redacted] provide their U.S. address)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Palm City	FLA	34990	Martin	USA

2.a. Mail(b) (6) [redacted] 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
Nashville	Tenn	37215	Davidson	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accu(b) (6) [redacted] d belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applic(b) (6) [redacted] ocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 3/30/18

se 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) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   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, N#A JAGNA 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 SENTEFOL
Address:	46 TV MOOLE STREET
City:	SOUTHERN INDUSTRIAL,
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?

   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?

   N/

   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/

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 i[redacted] States, cannot be re-exported.

    Applicant's signature: _____ Date: 3-30-18

    Be aware that there may be a[redacted]uirements 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

UNDP

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Resilient nations.

N≠A JAQNA CONSERVANCY
Namibia

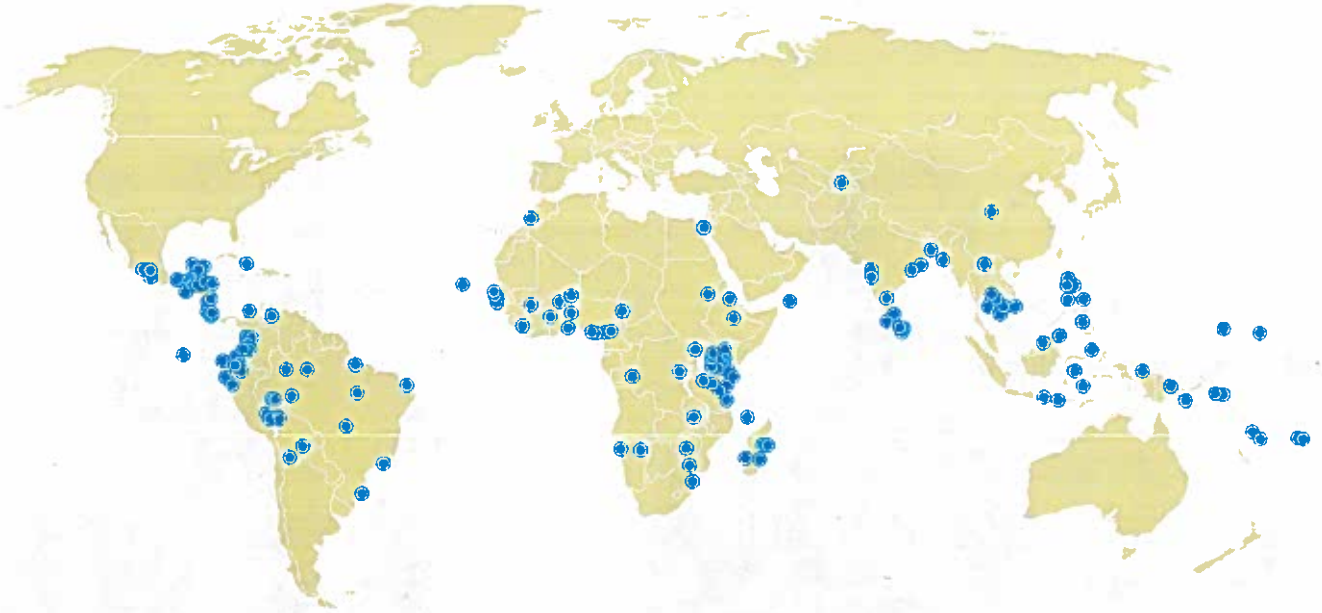
Equator Prize Winner

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

Contributing Writers

Edayatu Abieodun Lamptey, Erin Atwell, Toni Blackman, Jonathan Clay, Joseph Corcoran, Larissa Currado, Sarah Gordon, Oliver Hughes, Wen-Juan Jiang, Sonal Kanabar, Dearbhla Keegan, Matthew Konsa, Rachael Lader, Patrick Lee, Erin Lewis, Jona Liebl, Mengning Ma, Mary McGraw, Gabriele Orlandi, Juliana Quaresma, Peter Schecter, Martin Sommerschuh, Whitney Wilding, Luna Wu

Design

Oliver Hughes, Dearbhla Keegan, Matthew Konsa, Amy Korngiebel, Kimberly Koserowski, Erin Lewis, John Mulqueen, Lorena de la Parra, Brandon Payne, Mariajosé Satizábal G.

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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 FACTS

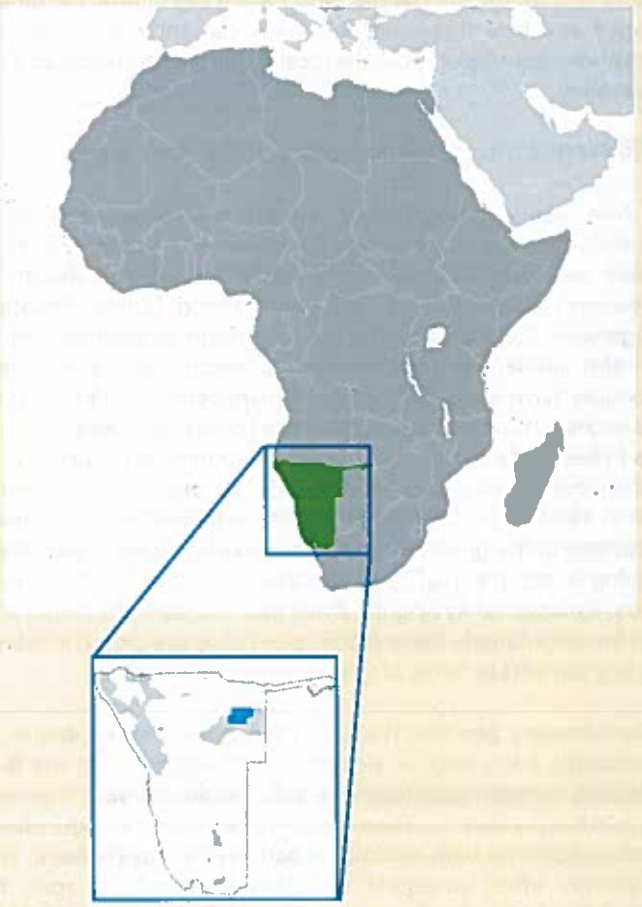
EQUATOR PRIZE WINNER: 2008

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≠a Jaqna

The N≠a 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≠a Jaqna is currently the largest registered conservancy in Namibia to date, with an area of more than 9,120km2. 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.

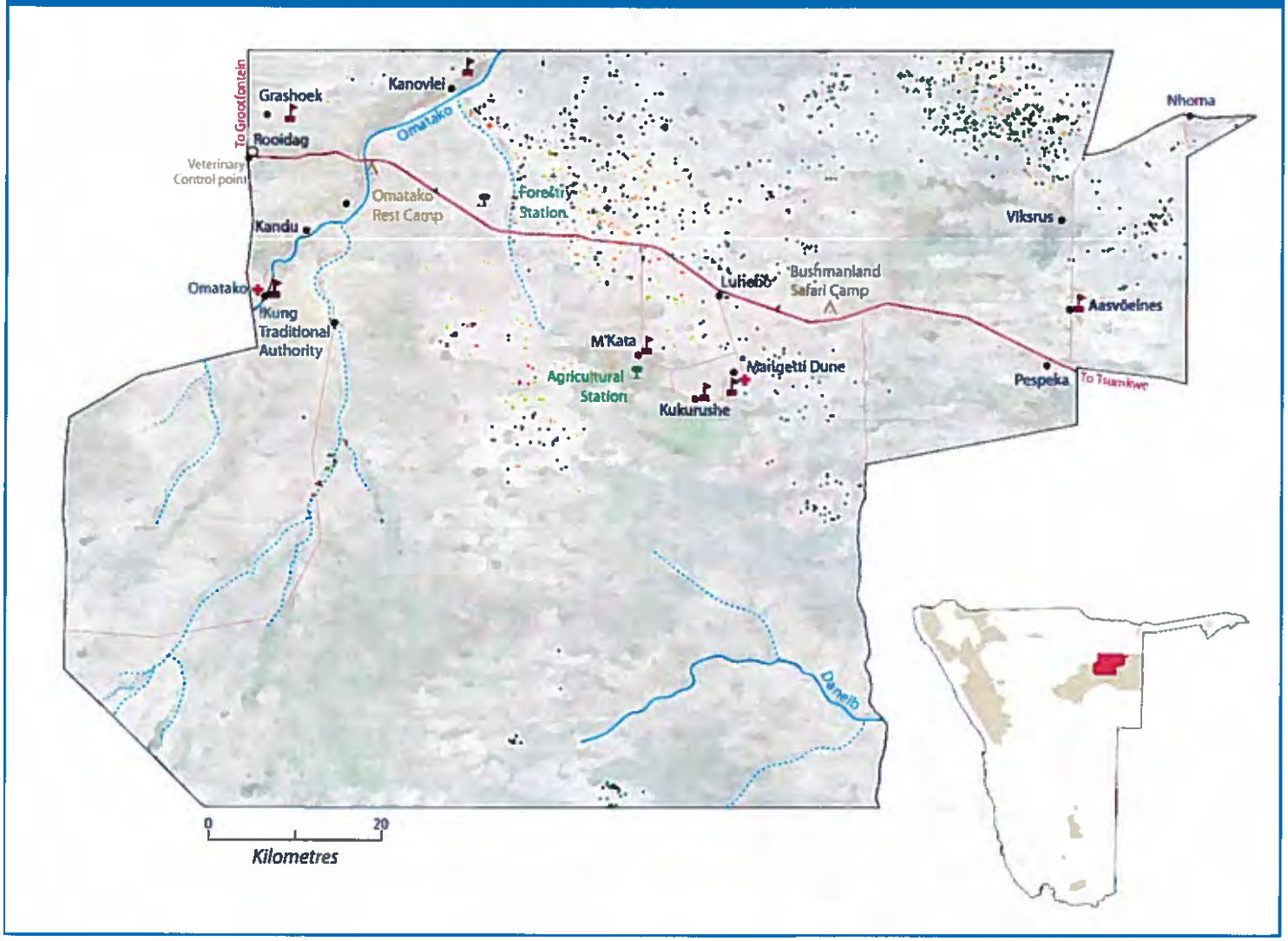
The increased abundance of game animals has given rise to a very successful tourism practice as well. The N≠a Jaqna Conservancy has a contract with a trophy hunting agency that in turn imports game animals each year. The acceptable quota for trophy hunters is quite specific in order to only take what 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≠a 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.

N≠a 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 N≠a 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 N≠a 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 N≠a 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 N≠a 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. Devils 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, N≠a 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 N≠a 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; N≠a 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 N≠a 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, N≠a 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 N≠a 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.

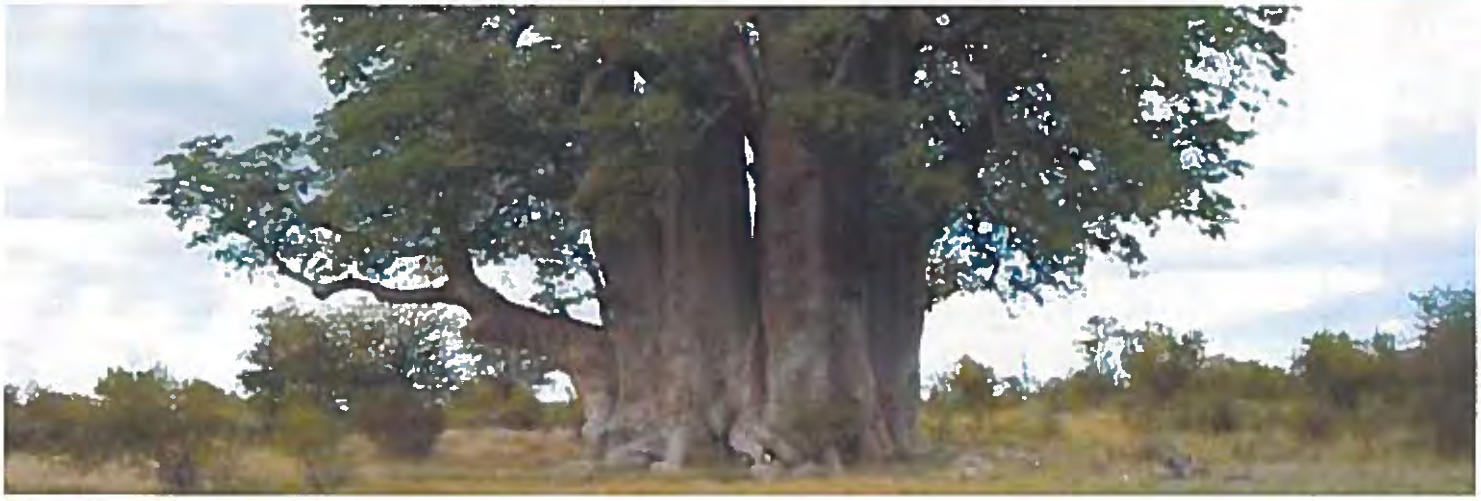
> *"Conservancy leaders literally travel village by village to gain the endorsement of the conservancy's membership. They either round everybody up into one place, or work with three or four villages in a day: having one meeting, driving three or four hours, having another meeting. They just carry on - 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, N≠a 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 N≠a Jaqna where planned small scale farms which would dispossess the San of land and destroy environmentally sensitive areas have been opposed through N≠a 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 N≠a 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 N≠a 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 N≠a 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 N≠a 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.

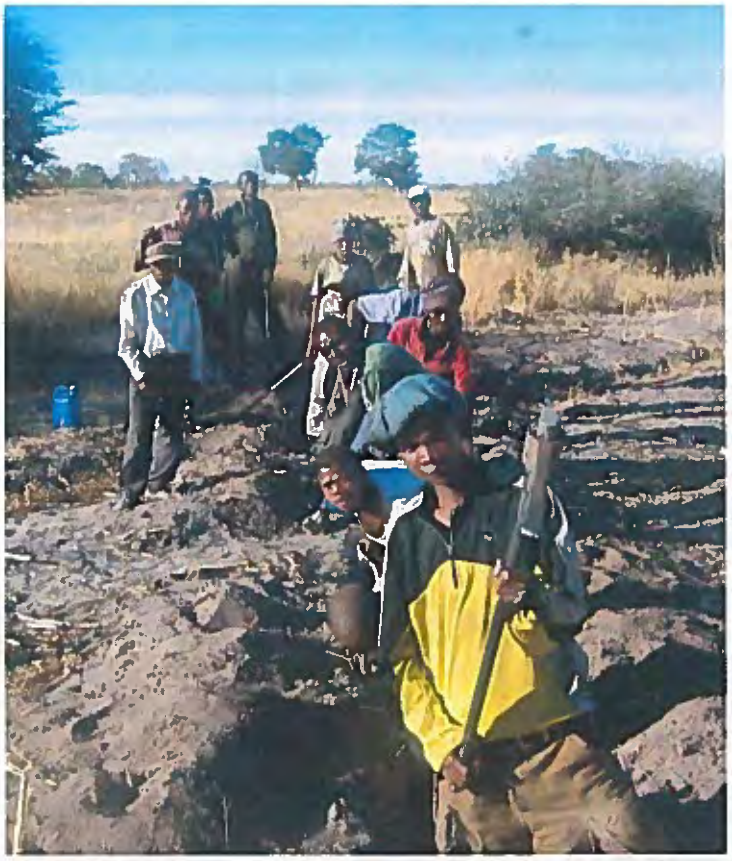
REPLICATION

There has already been replication and knowledge exchange between N≠a Jaqna and other communities and conservancies throughout Namibia, sharing best practices in tourism activities and land management techniques. N≠a 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 N≠a 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. N≠a 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 indispensible 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 N≠a 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
- 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

Click the thumbnails below to read more case studies like this:

Equator Initiative
Environment and Energy Group
United Nations Development Programme (UNDP)
304 East 45th Street, 6th Floor
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EQUATOR INITIATIVE

The United Nations Development Programme (UNDP) is the UN's global development network, advocating for change and connecting countries to knowledge, experience and resources to help people build a better life.

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A FORCE FOR WILDLIFE CONSERVATION

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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#a 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 (NACSO), 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^2 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

3240 South I-10 Service Road, West, Suite 200 • Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax: (504) 837-1145 • Email: jjj@conservationforce.org
http://www.conservationforce.org

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

Share / Save

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...

Website by JARO Consultancy

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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) [redacted]

Name: Lester Earl Bentz

Date: March 30, 2018

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

RCVD APR 16 2018

RCVD APR 16 2018

LO

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
BENTZ	Lester	Earl	

(b) (6) [redacted]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, prov[redacted] provide their U.S. address)

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Palm City	FLA	34990	Martin	USA

2.a. Mailing Address (Include if different than physical address; include name of contact person if applicable)

(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Nashville	Tenn	37215	Davidson	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accu[redacted]elief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

3/30/18

Signature of applic[redacted] ocopied or stamped signatures) Date of signature (mm/dd/yyyy)

se 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)?

[redacted] (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, N#A JAGNA 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 SENTEFOL
Address:	46 TV MOOLE STREET
City:	SOUTHERN INDUSTRIAL,
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?

   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?

   N/

   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/

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 i[redacted] States, cannot be re-exported.

    Applicant's signature: _____ Date: 3-30-18

    Be aware that there may be a[redacted]uirements 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

UNDP

Empowered lives.
Resilient nations.

N≠A JAQNA CONSERVANCY
Namibia

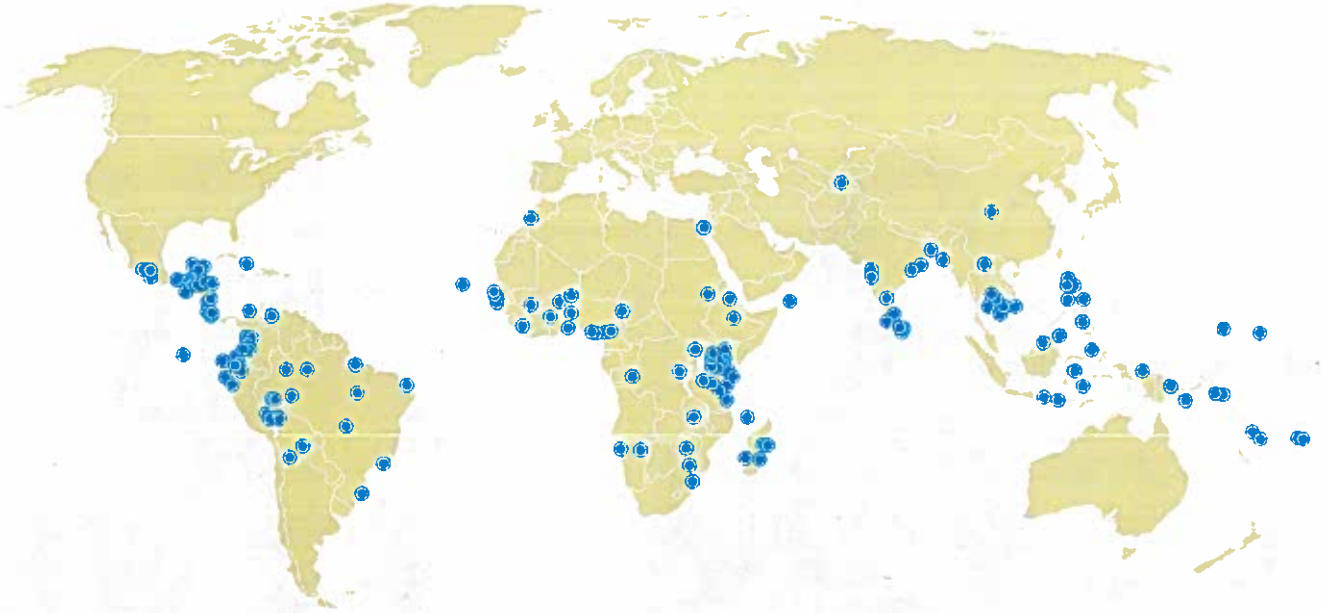
Equator Prize Winner

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.

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Editor-in-Chief: Joseph Corcoran
Managing Editor: Oliver Hughes
Contributing Editors: Dearbhla Keegan, Matthew Konsa, Erin Lewis, Whitney Wilding

Contributing Writers

Edayatu Abieodun Lamptey, Erin Atwell, Toni Blackman, Jonathan Clay, Joseph Corcoran, Larissa Currado, Sarah Gordon, Oliver Hughes, Wen-Juan Jiang, Sonal Kanabar, Dearbhla Keegan, Matthew Konsa, Rachael Lader, Patrick Lee, Erin Lewis, Jona Liebl, Mengning Ma, Mary McGraw, Gabriele Orlandi, Juliana Quaresma, Peter Schecter, Martin Sommerschuh, Whitney Wilding, Luna Wu

Design

Oliver Hughes, Dearbhla Keegan, Matthew Konsa, Amy Korngiebel, Kimberly Koserowski, Erin Lewis, John Mulqueen, Lorena de la Parra, Brandon Payne, Mariajosé Satizábal G.

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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 FACTS

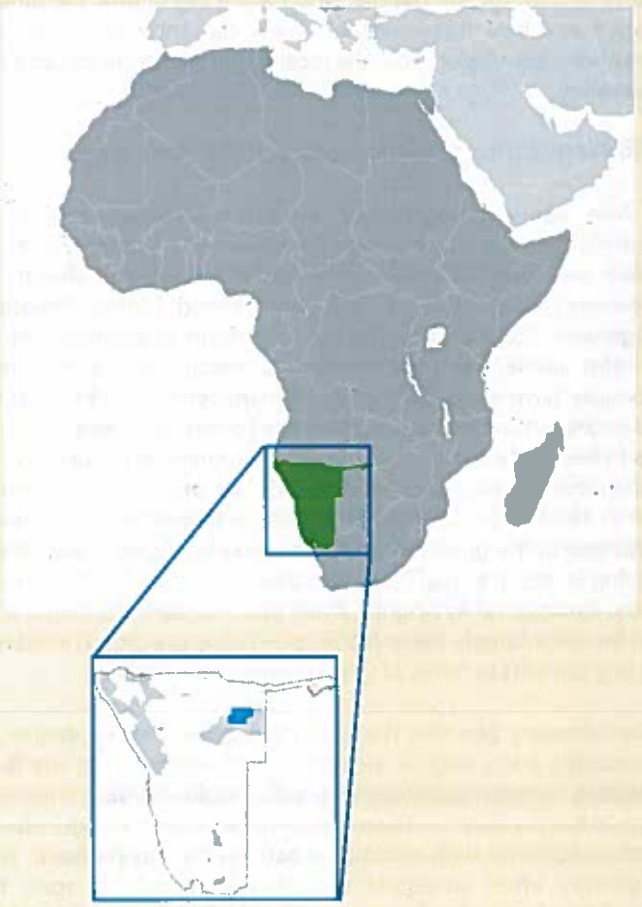
EQUATOR PRIZE WINNER: 2008

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≠a Jaqna

The N≠a 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≠a Jaqna is currently the largest registered conservancy in Namibia to date, with an area of more than 9,120km2. 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.

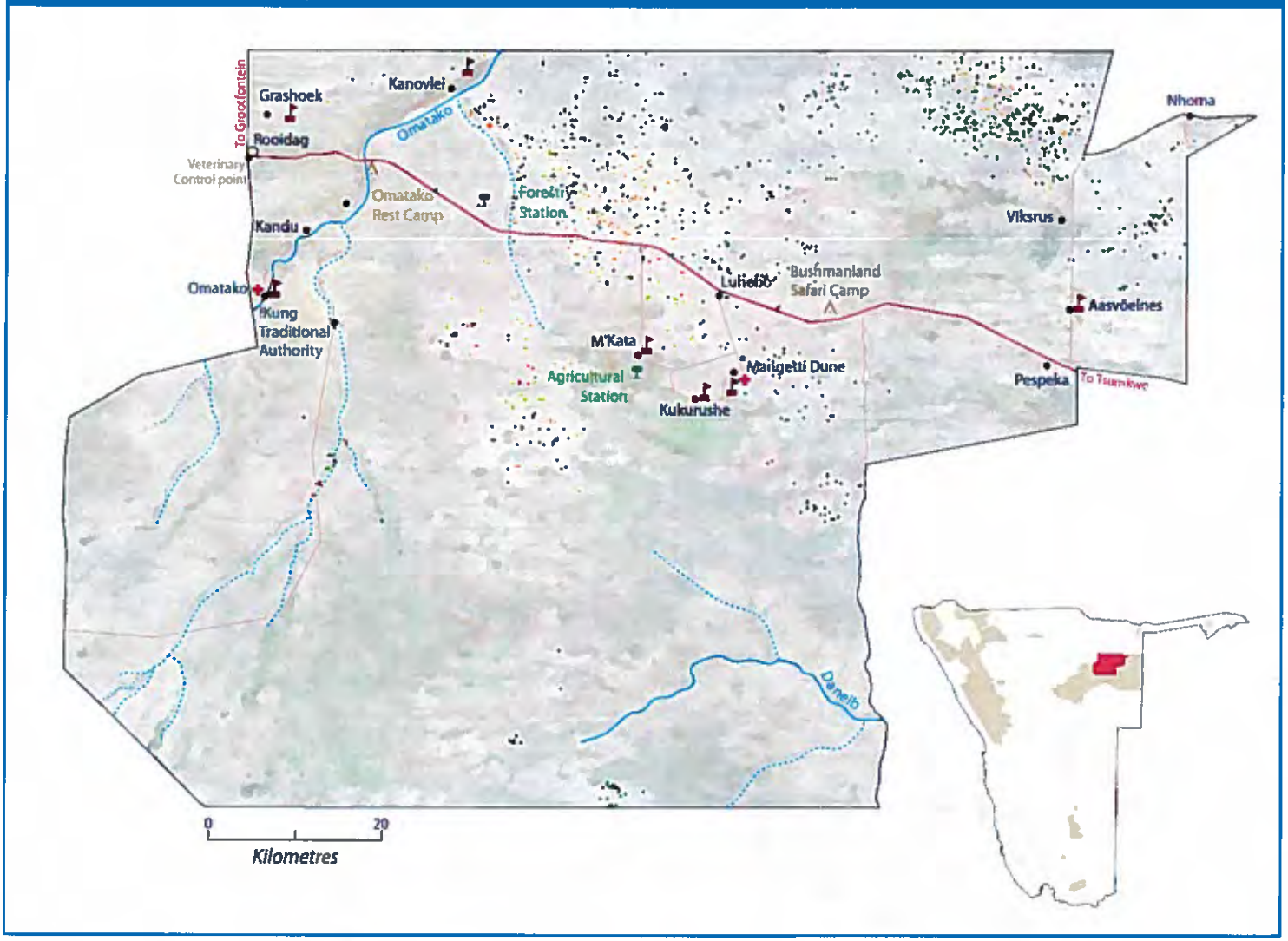
The increased abundance of game animals has given rise to a very successful tourism practice as well. The N≠a Jaqna Conservancy has a contract with a trophy hunting agency that in turn imports game animals each year. The acceptable quota for trophy hunters is quite specific in order to only take what 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≠a 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.

N≠a 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 N≠a 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 N≠a 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 N≠a 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 N≠a 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. Devils 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, N≠a 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 N≠a 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; N≠a 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 N≠a 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, N≠a 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 N≠a 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.

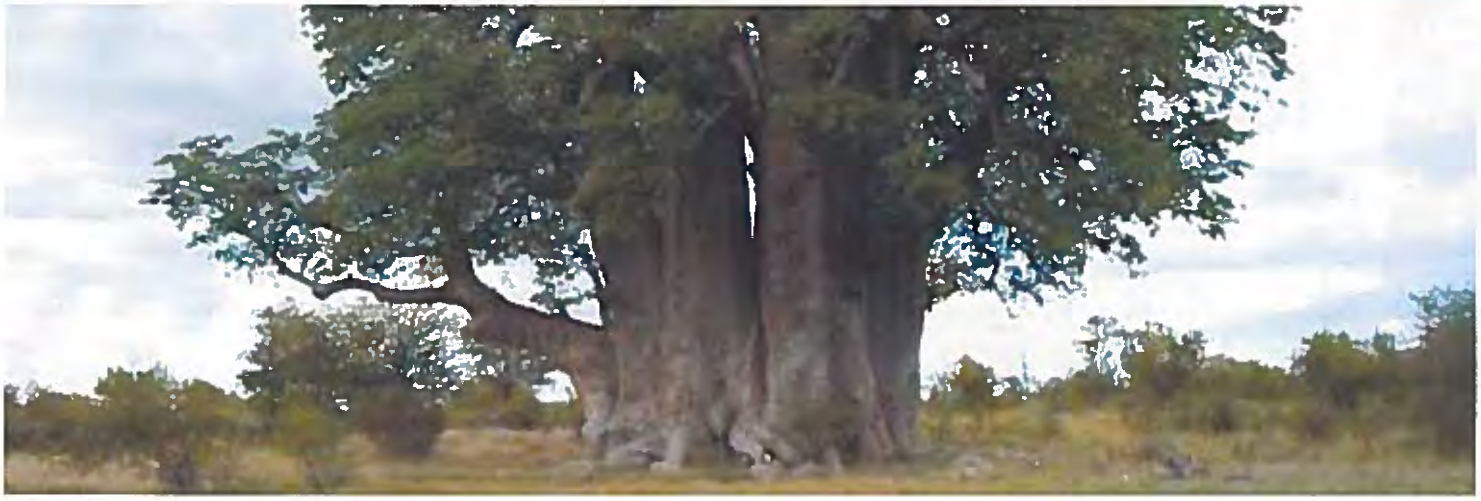
> *"Conservancy leaders literally travel village by village to gain the endorsement of the conservancy's membership. They either round everybody up into one place, or work with three or four villages in a day: having one meeting, driving three or four hours, having another meeting. They just carry on - 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, N≠a 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 N≠a Jaqna where planned small scale farms which would dispossess the San of land and destroy environmentally sensitive areas have been opposed through N≠a 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 N≠a 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 N≠a 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 N≠a 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 N≠a 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.

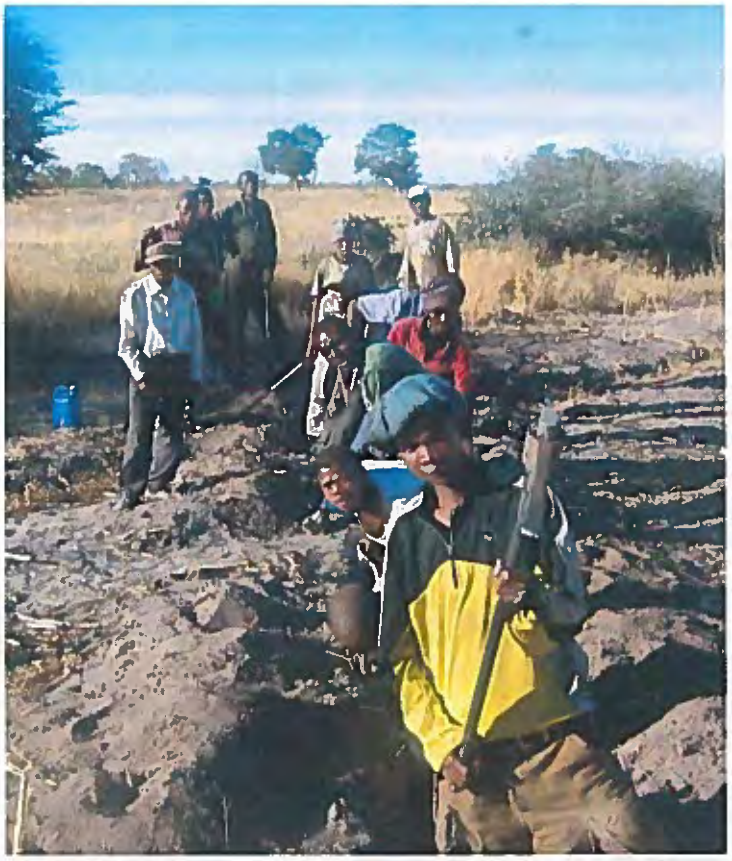
REPLICATION

There has already been replication and knowledge exchange between N≠a Jaqna and other communities and conservancies throughout Namibia, sharing best practices in tourism activities and land management techniques. N≠a 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 N≠a 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. N≠a 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 indispensible 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 N≠a 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

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Equator Initiative
Environment and Energy Group
United Nations Development Programme (UNDP)
304 East 45th Street, 6th Floor
New York, NY 10017
Tel: +1 646 781 4023
www.equatorinitiative.org

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MacDonald, Tim <tim_macdonald@fws.gov>

Sport Hunted Trophy

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Tue, Oct 1, 2019 at 11:37 AM
To (b)(6)

Hi Earl,

Thank you for returning my call. I was calling to get your email address to ask the question below. I'm trying to sort through all of the elephant trophy applications, to determine what permit applications are needed by the hunter, and what hunts were unsuccessful.

On **04/16/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 85830C**. At the me of the applic aon' s submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

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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

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] Fwd: Elephant information

1 message

earlbentz@gmail.com <(b) (6) Thu, Oct 3, 2019 at 10:49 AM
To: tim_macdonald@fws.gov

Here is the latest information on my successful elephant hunt. If you could give me a call at your convenience, I would be indebted. Thank you so much. Earl.(b) (6)

Sent from my iPhone

Begin forwarded message:

From: Peter Thormählen (b) (6)
Date: October 2, 2019 at
To: (b) (6)
Cc(b) (6) '"Anso Thormalen'" (b) (6)
Subject: Re: Elephant information

Dear Earl,

Hope you folks are well Sir.

I looked at the photos and we took your bull on 3 August, 2018.

It was hunted in the Ondjou Conservancy block of Bushmanland.
Closest Towns is Gam and Tsumkwe.
GPS Coordinates:
S 20* 02' 34.7"
E 020* 38' 01.1"

District is Grootfontein Town

PH - Peter Thormählen

Address:
92 Nelson Mandela Ave
Stillwater # 5
Klein Windhoek
Namibia

Please let me know if you need any additional information

Greetings to Janet

Kind Regards
Peter Thormählen

-------- Original message --------
From:(b) (6)
Date: 2019/10/02 22:54 (GMT+02:00)
To: (b) (6)
Subject: Elephant information

Peter and Anso—I have been contacted by the US Fish and Wildlife Service concerning my elephant permit. They want to know the exact date and location that I took my elephant. All I know it was Namibia last August. Can you please email me that information ASAP? Thank you so much. Earl

Sent from my iPhone

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		181684
VALID FROM:		01.08.18
VALID TO:		18.08.18
RECEIPT No.:		575974

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: L.E Bentz

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common		Springbok		Other	
Buffalo		Klipspringer		Steenbok		Jackal	2x
Crocodile		Kudu	1x	Warthog	1x	Caracal	1x
Dik-Dik		Lechwe		Waterbuck		*Report within 48hrs of hunt.	
Eland		Oryx (Gemsbok)	2x	Wildebeest, Black			
*Elephant	1x	Ostrich	1x	Wildebeest, Blue			
Giraffe		Reedbuck		Zebra Burchell's			
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan		Leopard			
Impala Black-Faced		Sable		Lion			

~~Elephant must be in~~ case of Res ~~inh~~ no 3 of Nature Con Ord 4 of 1975 discounted

On the following farms / hunting concessions / safari / guestfarm: Ondjou Conservancy

Guided by (name of guides): P. Thambabiko, A.M Albeds & T. Hihuikepa (SG)

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way and is not transferable.

Prime press 042018

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
03/08/18	Elephant								Male	Ondjou Conservancy		K. [redacted]	(b) (6)	[redacted]

*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.

[EXTERNAL] RE: Supplement to Permit # 85830C, Earl Bentz

Peter Thormahlen <peter@africatrophyhunting.com>

Thu 6/25/2020 1:07 PM

To: 'Aimee Korver' <permits@conservationforce.org>; Brisendine, Amy <amy_brisendine@fws.gov>; 'John Jackson, III' <jjjiii@att.net>; (b) (6)

3 attachments (3 MB)

Ondjou Conservancy-Operator Enhancement Report-2019.docx; Earl Bentz-1.jpg; Earl Bentz-2.jpg;

Dear Miss Brisendine,

Permit copies and Operator Enhancement Fowm attached

Kind Regards
Peter Thormahlen

From: Aimee Korver <permits@conservaon force.org>
Sent: Thursday, June 25, 2020 5:03 PM
To: Amy Brisendine <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@a.ne t>; (b) (6)
(b) (6)
Subject: Supplement to Permit # 85830C, Earl Bentz

Ms. Brisendine,

Attached you will find the operator enhancement report for the Conservancy where the elephant was actually taken on the hunt for this applicant.

The Ondjou Conservancy block of Busmanland was where the animal was taken as opposed to the N#A Jagna Conservancy that had been listed in the import permit application supplied before the hunt.

Please include this with our clients import permit application and let me know if you have any questions regarding this matter.

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

1. Name of area operator:
   Friederich Peter Johann Thormahlen,
   Name Used-Peter

a. Years in business: 18

b. Name of company conducting hunt: Thormahlen & Cochran Safaris

2. Name of concession: Ondjou Conservancy Size in km^2: 8729

a. Land tenure: __ Government lease __ Community x_ Private ranch __ Private conservancy

b. Length of concession agreement: 2 years Can it be renewed? _x_ Yes __ No

c. Length of renewal, if applicable: 9 years

d. Estimated total amount received in trophy fees last year, if applicable: $33,590

e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   ANSWER:
   Yes, there are special obligations under the concession agreement:

- ANNUAL REPORTING -The Trophy Hunting Operator must submit an Annual Report Yearly within 30 days after the hunting season ends, which is 30 November. These Annual Reports are handed in at the Ministry of Environment & Tourism, as well as a copy at the Conservancy office, and the WWF office. Failure to submit the report timeously is punishable with a fine of N$5,000.

- COMMUNITY INVESTMENT – We donate school stationary supplies for the local school through the SCI Blue Bag system in the amount of N$54,000 per annum, buy uniforms for community game scouts and community camp staff to the value of N$84,500.
  We donate the trophy hunting camp which was built at a cost of N$750,000 after a three-year period, back to the community and lease it from them so they can generate a monthly income from the trophy hunting camp. All maintenance is done by the Trophy Hunting Operator. The trophy hunting camp consist of 4 x client tents, dining area, kitchen tent, and 5 staff tents to the community.

  Drilling and maintaining of the boreholes in the concession to establish Permanent Wildlife Water Points is a crucial part of the concession development as water allows the elephants to become resident in the concession compared to the previous yearly migration into the concession when the natural pans fill up with water during the rainy season. After which the elephants move back into Khadoum National Park and Nyae Nyae Conservancy where there is Permanent Wildlife Water Points.

Installation of solar pump for water supply to the community members is also a crucial part of the community development program. Community members feel they are rewarded by the Conservation Developments when they receive fresh clean drinking water at their villages. This results in Wildlife Water Points being left alone and not damaged or settled around them, which chases the game away.

- COMMUNITY EMPLOYMENT - We permanently employ 5 Community Members as Camp Staff, and 12 community members as Casual labor in the concession. The Casual Workers are employed 10 months per year to open roads in the concession, open the concession boundaries (Cutlines), and to skin elephants when hunted. The Permanent Staff gets a basic salary of N$2,000 per month. The Casual workers get a monthly salary of N$1,750 per month. On average N$210,000 salary is paid per annum to Casual Workers who are community members, which is a great inflow of funds in the poor community.

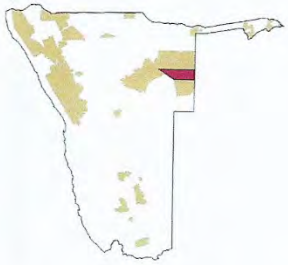
- MEAT DISTRIBUTION – All hunted Trophy, as well as Non-Trophy game meat is distributed to villages in the concession within 24 hours after being hunted. As a company Policy we do not leave any remains of elephant where it was hunted - no bones, skin, meat etc. After 2 days diesel is poured onto the stomach gcontent and blood at the slaughtering site, wood stacked on top and burned. This is done to cause as little as possible stress on the elephants as there is no smell left of the hunted elephant or its remains. Elephant gets stressed seriously when bones and skin is left at the site!

- ANTI POACHING PROGRAM – Establishment of Wildlife Water Points is the first and most crucial development in the concession so that existing game becomes resident in the concession! After Permanent Wildlife Water Points (PWWP's) are established we start our Anti-Poaching program to protect the PWWP Equipment as well as the existing game. Currently all personnel are utilized as anti-poaching staff when no safaris take place. Community Game Scouts are on permanent anti-poaching patrols. Equipment and funding remain the biggest challenges as equipment is expensive.

f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:

Nearest town is Gam.

Nearest City is Windhoek -650 km away.

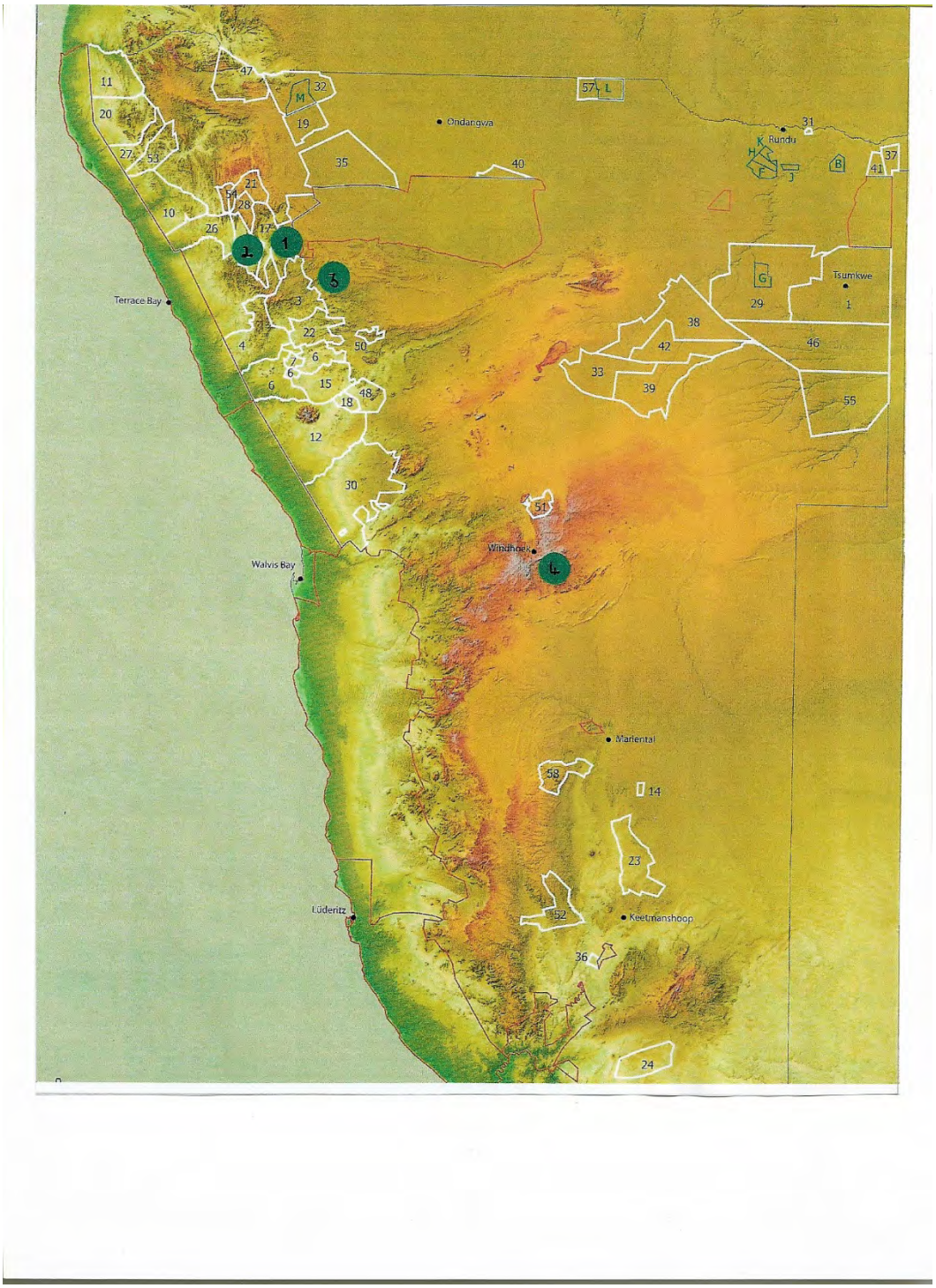


ONDJOU

(named after the Otjiherero word for 'elephant')

Registered	October 2006
Address	Ondjou Conservancy Private Bag 2008, Grootfontein
Telephone	067 245509
Approximate population	2,000
Main home languages	Otjiherero, San
Area	8,729 square kilometres
Region	Otjozondjupa
Geographical features	Characterised by undulating landscape and diverse vegetation including woodlands, grassland and well-defined drainage lines. Rock outcrops may have archaeological significance.
Unusual or important features	Traditional culture of Herero people.
Major wildlife resources	Elephant, lion, leopard, giraffe, kudu, steenbok, gemsbok, wild dog, spotted hyaena, cheetah, black-backed jackal.
Management	Management Committee of six women and ten men; one staff; no wildlife monitoring at present.
Enterprises	Trophy hunting; devil's claw harvesting.
Support Agencies	MET, MAWF, NCDC, LAC, NNF

Map attached, Ondjou Conservancy is no 46 on the map



g. If the concession borders a national park, please provide the park name:
_____N/A_____

h. Description of general and distinctive habitat features and any water features:

Ondjou is named after the Otjiherero word for elephant.

Geographical features:

Characterised by undulating landscape and diverse vegetation including woodlands, grassland and well-defined drainage lines. Rock outcrops may have archaeological significance.

Unusual or important features:
Traditional culture of Herero people.

Major wildlife resources:
Elephant, lion, leopard, giraffe, kudu, steenbok, gemsbok, wild dog, spotted hyaena, cheetah, black-backed jackal.

3. Are there any communities living in the concession? x Yes __ No

   a. If so, estimated number of people or villages in the concession? 2969 people

4. Are there communities bordering this concession? x__ Yes __ No

   a. If so, estimated number of people or villages around the concession?

   Na# Jaqna Conservancy on the northern boundary with Bushman (San) communities, Nyae Nyae Conservancy on the northern boundary with Bushman (San) communities, and Eiseb Conservancy on the southern boundary with Damara communities. See Conservancy map. Not densily populated. Bushman tribes and Damara in the neighboring concessions.

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	abundance	450 – 550	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Leopard	abundance	400	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Cheetah	sparse	20	stable	Count Surveys by Community Game

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

				Guards, #MET & *NACSO
Wild dog	average	35	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Hyena-Spotted	average	35	Stable	Count Surveys by Community Game Guards, #MET & *NACSO
Hyena - Brown	abundant	150	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Caracal	abundant	450	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
African Wildcat	Abundunt	250	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Genet Cat	abundant	350	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Black Backed Jackal	abundant	1,000	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Porcupine	abundant	500 +	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Spring Hare & Rabbit	abundant	100 +	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Guinea Fowl	abundant	2,000 +	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Francolin	abundant	1,000 +	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Doves	abundant	10,000 +	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Prey species	Abundance: oryx, ostrich, Steenbuck, grey duiker, eland, kudu, guinea fowl, francolin, doves	10,000 +	upwards	Count Surveys by Community Game Guards, #MET & *NACSO

Eland	average	400	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Gemsbuck	average	400	stable	Count Surveys by Community Game Guards, #MET & *NACSO
SG Kudu	average	250	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Steenbuck	abundant	500	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Common Duiker	abundant	500	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Warthog	average	200	Stable to down due to lack of permanent water points	Count Surveys by Community Game Guards, #MET & *NACSO

* NACSO – Namibian Association of Community Based Natural Resource Management Support Organization

MET – Ministry of Environment & Tourism

6. Total employment number: __5__

   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	6	2
Trackers	4	1
Anti-poaching scouts/rangers	9	9
Other anti-poaching		
Cooks/housekeepers	2	2
Community coordinators	1	1
Managers	2	1
Biologists		
Others: _____		

7. Number of staff employed in the off-season:

   5 x Camp Staff, 9 x anti-poaching Game Guards.

a. Please identify the number and type of staff that are engaged when the season is not open:

5 x Camp Staff, 9 x anti-poaching Game Guards

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	9	9	2018 to date
Managers	1	1	2018 to date
Maintenance	1	1	2018 to date
Road opening/construction			
Community relations personnel			
Others: Camp Staff_____	5	5	2018 to date

8. Anti-poaching efforts:[2]

a. Number of anti-poaching staff: __9__

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both

c. Months during which anti-poaching patrols are conducted: every month of the year

d. Number of anti-poaching patrols per month: Project staff carried out foot, vehicle, donkey patrols - for inaccessible areas

e. Description of anti-poaching equipment, vehicles, etc.: Patrol 4x4 cars and on foot, and donkey.

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Namibian Police and Game Department

g. Do you offer rewards to poaching informants leading to arrest? _x_ Yes __ No

h. Do you offer rewards to poaching informants upon conviction? _x_ Yes __ No

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in?

Type of expense	Spending 2018-N$	Spending 2019 -N$	Spending 2020 – N$	Remarks
Salaries for anti-poaching scouts	N$91,800 - N$850 per month x 9 scouts	N$91,800 - N$850 per month x 9 scouts	N$91,800 - N$850 per month x 9 scouts	
Equipment	N$20,000	N$20,000	N$50,000	
Vehicles	N$500,000 – Landcruiser pick-up	N$500,000 – Landcruiser pick-up	N$500,000 – Landcruiser pick-up	
Diesel	N$50,000	N$50,000	N$50,000	
Rewards paid				
Other: _____				
Other: _____				
TOTALS	N$661,800	661,800	691,800	

9. Anti-poaching results:

Category	2018	2019		Remarks
Poaching incidents discovered	7	0		Eland, Gemsbuck, Steenbuck, and spotted hyena poisoned
Elephant carcasses observed	0	0		No Elephant poached
Lion carcasses observed	N/A	N/A		No Lions
Leopard carcasses observed	0	0		None killed
Ivory poachers arrested	0	0		No Elephant poaching yet
Meat poachers arrested	1	0		Killed Eland cow
Other poachers arrested	2	0		Stole solar panels at PWWP
Poachers convicted	2	0		Prison sentence
Snares/gin traps collected	0	0		Poaching with dogs & horses. No snares used due to cattle in concession
Firearms confiscated	0	0		Dogs & Horses used
Vehicles confiscated	0	0		Dogs & Horses used
Bicycles confiscated	0	0		Dogs & Horses used
Boats/nets confiscated	0	0		Dogs & Horses used
Tusks recovered	N/A	N/A		No Elephants yet
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X__ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? _

Communities gets 100% of money contributed by Hunters for non-exportable game (Own Use Quota). The Donation for a Non-Exportable elephant is US$15,000 of which US$3,500 goes to the community, and the rest is used to establish PWWP's in the concession as wildlife water points is our primary development goal. Without water the concession is just a "Green Desert" because all surface water seeps into the sandy soil. Two non-exportable elephant is on quota yearly. The Communal fee is a contractual fee.

Our clientele is primarily USA citizens who donate SCI Blue Bags with school stationary supplies. Each hunter hunting in the conservancy donates between one and two SCI Blue bags with school stationary at a value of US$200 each bag. Hence a minimum of 5-10 SCI Blue Bags is donated at a value of N$13,500 to N$27,000. The SCI Blue Bag donations is a Voluntary fee.

c. Does the company provide game meat to nearby communities? X_ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:

All the game animals hunted by us per the allocated quotas of the Minister of Environment and Tourism, go to the local community of Ondjou.

Elephant x 4 on quota x 4,500 kg meat x N$22 per kg = N$396,000 worth of meat is distributed to the Ondjou Communities.

A list of all villages that need to receive meat is handed to the hunting operator by the Management Committee, and meat must be distributed within 24 hours after an animal is hunted. If not distributed within 24 hours after the hunt the contractual penalty fee is N$22 per kilogram meat. With elephant that is a fine of N$99,000 per elephant or US$7,300.

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.

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

The Ondjou Concession block is not a horticulture area, and very little crops are raised. Mainly cattle, goats, donkey, and horses are raised by community members.

When an elephant damages any property, problem elephant situations are raised by the local community and it is addressed with the Chairman of the Community. The chairman then reached out to the Minister of Environmental and Tourism, who investigates the Wildlife Human conflict, and approves the problem animal permit in writing when enough evidence is collected by the Ministry. The Chairman then reached out to the Hunting Operator to provide a client. If a suitable client is found, there is a certain time limit to hunt the animal and the permit will be issued with the client's details.

The Operator must pay the community a predetermined contractual fee for the problem animal, and the meat has to be distributed to villages on the meat delivery list as per contract

f. Please describe any consolation payments made to residents damaged by game species. What currency are the expenditures reported in?

There is a Government Fund that is supposed to refund the community for damages, however it is depleted. Thormahlen & Cochran Safaris pays the community members compensation agreed upon by the community, the hunting operator and the Minister of Environment and Tourism, when damage was done to keep the community from killing the animals.

Species	Damage caused	Consolation paid 2018	Consolation paid 2019	Consolation paid 2020
Elephant	Very little damage caused	N$0		
Lion	N/A – No Lion in Concession	N/A	N/A	N/A
Leopard	Goats, Calves, Donkey caught	N$0		
Wild Dogs	Calves & Goats caught	N0$		
Spotted Hyena	Cattle calves caught	N$0 due to hyenas being poisoned. Perpetrator arrested by MET		
Porcupine	Destroy the little crops there is.	N$0		
Caracal	Goats killed	N$0		
TOTAL DAMAGED CAUSED	**N$140,000**	N$0		

According to a report done by NACSO, there is human wildlife conflict, whereby hyena and wild dogs are the most troublesome and are responsible for the most incidents, followed by porcupine, leopard and caracal.

The cost of estimated human wildlife conflict cost on average, **is N$140 000 per year**.

The estimated poaching of high value species was none.

Natural resource benefits outweighed the conflict costs.

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____**Namibian$**_____

Type of project	Spending 2018	Spending 2019	Spending 2020	Remarks
Education e.g. School Stationary supplies	N$55,000	N$55,000	N$	20 blue bags @ $200 per bag = $4000, or N$55000. Clients donate $200, we fill-up the bag to the total of $200 with the necessary school or educational supplies, identified by the local schools.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Community scout Uniforms	N$40,500	N$		
Camp Staff Uniforms	N$33,500	N$		
Other community - Training of Camp Staff	N$75,000	N$		
Local government activities				
Water infrastructure improvements	N$204,000	N$		Maintain the borehole and insert solar pumps to establish * PWWP's.

Sports teams funded	N$5,000	N$5,000		
Trophy Hunting Camp material donated	N$1,174,495	N$		Full tented safari camp with en-suite bathrooms
Other: Airstrip Cleared	N$176,300	N$		Military airstrip cleared to charter clients into hunting area.
Other: Camp Staff Salaries	N$47,250	N$		
Casual Community Member Labor Salaries	N$280,000	N$		Used to built camp and clear airstrip
TOTALS	**N$2,091,045**	**M$**		

* PWWP's -Permanent Wildlife Water Points

INVESTMENT SUMMARY - 2018

UTILIZATION & DEVELOPMENT OF THE ONDJOU COMMUNITY

TOTAL SALARIES & TRAINING COST- 2016

Thormahlen & Cochran Safaris spent the following amounts on training and labour in 2018:

- **Training of Camp Staff-N$75,000**
- **Camp Staff Salaries – N$47,250**
- **Casual Labour Salaries – N$280,000**
- **Staff & Casual Workers Workwear Uniforms – N$33,500**

TOTAL COST – N$435,750

NOTE:

- Training Camp Staff – 3 staff x N$3,125 pm x 8 months
- Camp Staff Salaries – 3 staff x 9 months x N$1,750 ea
- Casual Labour – 20 casuals x 8 months @ N$1,750 ea
- Staff Uniforms – 3 x N$4,500 ea
- Casual Workers Equipment – N$1,000 ea

Casual Workers cleared the Trophy Hunting Campsite at Ondjou Conservancy where we built a Permanent Trophy hunting camp. The first trophy hunting Camp ever at Ondjou Conservancy.
Casual workers cleared a strip of bush and dug the trench for the water pipeline to the trophy hunting camp from Post 2, a distance of 3,5 kilometres.
The casual workers also cleared the Ondjou Airstrip which was overgrown for 28 years since the Namibian Bush War with South Africa. The airstrip is operational after 28 years and the first clients flied into Gam for their elephant hunt.

TOTAL WATER DEVELOPMENT COST - 2018

Thormahlen & Cochran Safaris donated diesel to Mooiplaas Post, Mangetti Post, and Otjijere Post so that the village members can pump water for the elephants. An average of 25 litre diesel was donated every week, hence 200 litre per village per month for 8 months.

We also donated a new Lister Pump to the community at Post 2 where the trophy hunting camps water is coming from.
A plastic Pipeline was laid from Post 2, to the trophy Hunting Camp. A total distance of 3,5 kilometres.
A 10,000 litre plastic tank on a 6 meter steel stand was erected at Post 2 to store the trophy hunting camp's water.
At the Trophy Hunting Camp two plastic Tanks (5,000 & 2,500 litre) was erected on steel stands.

TOTAL WATER DEVELOPMENT COST

- **Diesel to pump water for elephants – N$76,000**
- **Lister Pump Cost – N$16,000**
- **Plastic Pipe Cost – N$35,000**
- **Water tank 10,000 -N$9,700**
- **Water Tank 5,000 litre – N$4,700**
- **Water tank 2,500 litre – N$2,700**
- **Steel Tank stand 10,000 litre tank – N$37,000**
- **Steel Tank Stand 5,000 & 2,500 litres tanks – N$23,000**

TOTAL COST – N$204,000

NOTES:

- Diesel 200 litre x 3 villages x 8 months x N$16 per litre
- Plastic pipeline of 40 mm class 6 @ N$10 per meter x 3,500 meters

TOTAL CAMP DEVELOPMENT COST - 2016

- **Camp Material –N$650,000**
- **Camp Building Cost –N$240,000**
- **Tents & Equipment – N$284,495**

TOTAL COST – N$1,174,495

GAM AIRSTRIP REHABILITATION COST-2018

- Vehicle Cost -N$40,000
- Big Game PH Salary Cost – N$50,000
- Steel Wire to fence off Airstrip for Airplane Safety – N$33,000
- Anchor Poles – N$12,000
- Dropper Poles – N$21,700
- Trailer Rental -N$8,500
- Steel Gate – N$1,000
- Windsock -N$3,500
- Windsock steel post -N$1,000
- Cement -N$2,000
- Molopo Tree Poison – N$3,600

TOTAL AIRSTRIP COST – N$176,300

SCHOOL STATIONARY DONATIONS

TOTAL SCHOOL STATIONARY DONATED – N$55,000

TOTAL DEVELOPMENT / INVESTMENT – 2018:

A TOTAL OF N$2,091,045 was invested in Ondjou Conservancy

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

We operate in South Africa and Namibia, and the figures below, is for the whole operation. In Ondjou we only hunt what is allocated on quota, and it is fixed by the

Government. The Namibian Government, specifically the Minister of Environment and Tourism, set strict quotas at the beginning of every three years, revising it at the end of each year when the Hunting operator must submit a Hunting Report on that specific year. So, before the client arrives, the hunting operator must take out a hunting permit – and this is only available if it falls within the quota that was pre-approved.

Current Ondjou Trophy quota: 2 x trophy elephant, 2 x own use elephant, 4 x Steenbuck, 2 x caracal, 5 x jackal, 3 x kudu, 1 x leopard, 3 x ostrich, 4 x Oryx, 3 x warthog. 1 x duiker.

The table below is for the total of Thormahlen & Cochran's concessions:

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all other species
Number of U.S. clients	2015: 4 clients 2016: 9 2017: 5 2018: 4	2015: 2016: 2017: 2018: 1	2015: 2 clients 2016: 9 2017: 9 2018: 10	2015: 126 clients 2016: 110 2017: 141 2018: 83
Percentage of U.S. clients	2015: 99 % 2016: 98 % 2017: 100 % 2018: 98 %	2015: 2016: 2017: 2018: 100 %	2015: 100 % 2016: 98 % 2017: 99 % 2018: 100 %	2015: 95 % 2016: 96 % 2017: 97 % 2018: 95 %
Trophy fees paid by U.S. clients – US$	2015: $220,000 2016: $495,000 2017: $275,000 2018: $260,000	2015: 2016: 2017: 2018: $75,000	2015: $42,000 2016: $225,000 2017: $256,000 2018: $265,000	2015: $303,715 2016: $1,075,000 2017: $997,375 2018: $410,110

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:

    95%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

    Thormahlen & Cochran Safaris policy in our hunting blocks is:

    - to only hunt Leopard males of six years and older;
    - to only hunt Trophy elephant bulls of 47 years and older;
    - to only hunt elephant bulls in excess of 55 lbs tusks.

    This way we enhance the genetic trophy quality by hunting post-productive animals only.

Thormahlen & Cochran operates on other conservancies in Namibia, namely:
Na#Jaqna
Ondjou
Ozondundu
Otuzemba
Anabeb
Orupupa (2015-2017)
Otjambangu
Ombuijokanguidi
Okangundumba
Impalila
Kabulabula
We built trophy hunting camps in Na Jaqna, Ondjou, Anabeb, Impalila and Kabulabula.
Thormahlen & Cochran donate all the camps to the Conservancies.
We deliver all the meat that we hunt, to the conservancies, and
Donate to every local school school stationary SCI blue bags.
We are building roads and are responsible for the water and electricity supply for the camps.
We employ the local community as staff and currently employ 5 to 6 conservancy members per camp as staff.
We are also responsible for the training of the staff to be able to serve the overseas clients.
To date we have 32 community members employed in the various camps.
We also have social responsibilities towards the conservancies: we built a school hostel, a community hall, drilling of waterholes, making Cutlines, building roads etc.
Ondjou's camp was built in 2018 for **N$1,174,495**.
We are buying protective clothing to the game guards and uniforms for the personnel on an annual basis.
Two of the most significant benefits for the conservancy, is the cash income derived from the trophy hunting activities to cover its own running cost, and to invest in their social programs, and the yearly employment of its own community members.

14. I declare that the foregoing is true and correct.

Signature:

Name: FPJ Thormahlen Title: Mr

[EXTERNAL] Supplement to Permit # 85830C, Earl Bentz

Aimee Korver <permits@conservationforce.org>

Thu 6/25/2020 11:07 AM

To: Brisendine, Amy <amy_brisendine@fws.gov>; John Jackson, III <jjjiii@att.net>; (b) (6)
(b) (6)

1 attachments (2 MB)

OperatorEnhanceOndjouConservancy.pdf;

Ms. Brisendine,

Attached you will find the operator enhancement report for the Conservancy where the elephant was actually taken on the hunt for this applicant.

The Ondjou Conservancy block of Busmanland was where the animal was taken as opposed to the N#A Jagna Conservancy that had been listed in the import permit application supplied before the hunt.

Please include this with our clients import permit application and let me know if you have any questions regarding this matter.

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

1. Name of area operator:
   Friederich Peter Johann Thormahlen,
   Name Used-Peter

a. Years in business: 18

b. Name of company conducting hunt: Thormahlen & Cochran Safaris

2. Name of concession: Ondjou Conservancy Size in km^2: 8729

a. Land tenure: __ Government lease __ Community x_ Private ranch __ Private conservancy

b. Length of concession agreement: 2 years Can it be renewed? _x_ Yes __ No

c. Length of renewal, if applicable: 9 years

d. Estimated total amount received in trophy fees last year, if applicable: $33,590

e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
   ANSWER:
   Yes, there are special obligations under the concession agreement:

- ANNUAL REPORTING -The Trophy Hunting Operator must submit an Annual Report Yearly within 30 days after the hunting season ends, which is 30 November. These Annual Reports are handed in at the Ministry of Environment & Tourism, as well as a copy at the Conservancy office, and the WWF office. Failure to submit the report timeously is punishable with a fine of N$5,000.

- COMMUNITY INVESTMENT – We donate school stationary supplies for the local school through the SCI Blue Bag system in the amount of N$54,000 per annum, buy uniforms for community game scouts and community camp staff to the value of N$84,500.
  We donate the trophy hunting camp which was built at a cost of N$750,000 after a three-year period, back to the community and lease it from them so they can generate a monthly income from the trophy hunting camp. All maintenance is done by the Trophy Hunting Operator. The trophy hunting camp consist of 4 x client tents, dining area, kitchen tent, and 5 staff tents to the community.

  Drilling and maintaining of the boreholes in the concession to establish Permanent Wildlife Water Points is a crucial part of the concession development as water allows the elephants to become resident in the concession compared to the previous yearly migration into the concession when the natural pans fill up with water during the rainy season. After which the elephants move back into Khadoum National Park and Nyae Nyae Conservancy where there is Permanent Wildlife Water Points.

Installation of solar pump for water supply to the community members is also a crucial part of the community development program. Community members feel they are rewarded by the Conservation Developments when they receive fresh clean drinking water at their villages. This results in Wildlife Water Points being left alone and not damaged or settled around them, which chases the game away.

- COMMUNITY EMPLOYMENT - We permanently employ 5 Community Members as Camp Staff, and 12 community members as Casual labor in the concession. The Casual Workers are employed 10 months per year to open roads in the concession, open the concession boundaries (Cutlines), and to skin elephants when hunted. The Permanent Staff gets a basic salary of N$2,000 per month. The Casual workers get a monthly salary of N$1,750 per month. On average N$210,000 salary is paid per annum to Casual Workers who are community members, which is a great inflow of funds in the poor community.

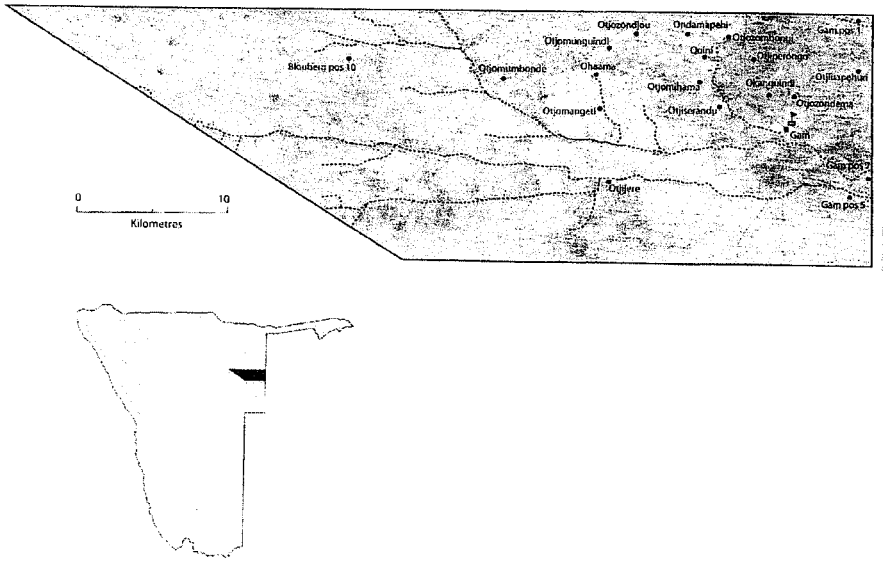
- MEAT DISTRIBUTION – All hunted Trophy, as well as Non-Trophy game meat is distributed to villages in the concession within 24 hours after being hunted. As a company Policy we do not leave any remains of elephant where it was hunted - no bones, skin, meat etc. After 2 days diesel is poured onto the stomach gcontent and blood at the slaughtering site, wood stacked on top and burned. This is done to cause as little as possible stress on the elephants as there is no smell left of the hunted elephant or its remains. Elephant gets stressed seriously when bones and skin is left at the site!

- ANTI POACHING PROGRAM – Establishment of Wildlife Water Points is the first and most crucial development in the concession so that existing game becomes resident in the concession! After Permanent Wildlife Water Points (PWWP's) are established we start our Anti-Poaching program to protect the PWWP Equipment as well as the existing game. Currently all personnel are utilized as anti-poaching staff when no safaris take place. Community Game Scouts are on permanent anti-poaching patrols. Equipment and funding remain the biggest challenges as equipment is expensive.

f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:

Nearest town is Gam.

Nearest City is Windhoek -650 km away.



ONDJOU

(named after the Otjiherero word for 'elephant')

Registered	October 2006
Address	Ondjou Conservancy Private Bag 2008, Grootfontein
Telephone	067 245509
Approximate population	2,000
Main home languages	Otjiherero, San
Area	8,729 square kilometres
Region	Otjozondjupa
Geographical features	Characterised by undulating landscape and diverse vegetation including woodlands, grassland and well-defined drainage lines. Rock outcrops may have archaeological significance.
Unusual or important features	Traditional culture of Herero people.
Major wildlife resources	Elephant, lion, leopard, giraffe, kudu, steenbok, gemsbok, wild dog, spotted hyaena, cheetah, black-backed jackal.
Management	Management Committee of six women and ten men; one staff; no wildlife monitoring at present.
Enterprises	Trophy hunting; devil's claw harvesting.
Support Agencies	MET, MAWF, NCDC, LAC, NNF

Map attached, Ondjou Conservancy is no 46 on the map

g. If the concession borders a national park, please provide the park name:
_____N/A_____

h. Description of general and distinctive habitat features and any water features:

Ondjou is named after the Otjiherero word for elephant.

Geographical features:

Characterised by undulating landscape and diverse vegetation including woodlands, grassland and well-defined drainage lines. Rock outcrops may have archaeological significance.

Unusual or important features:
Traditional culture of Herero people.

Major wildlife resources:
Elephant, lion, leopard, giraffe, kudu, steenbok, gemsbok, wild dog, spotted hyaena, cheetah, black-backed jackal.

3. Are there any communities living in the concession? x Yes __ No

   a. If so, estimated number of people or villages in the concession? 2969 people

4. Are there communities bordering this concession? x__ Yes __ No

   a. If so, estimated number of people or villages around the concession?

   Na# Jaqna Conservancy on the northern boundary with Bushman (San) communities, Nyae Nyae Conservancy on the northern boundary with Bushman (San) communities, and Eiseb Conservancy on the southern boundary with Damara communities. See Conservancy map. Not densily populated. Bushman tribes and Damara in the neighboring concessions.

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	abundance	450 – 550	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Leopard	abundance	400	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Cheetah	sparse	20	stable	Count Surveys by Community Game

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

				Guards, #MET & *NACSO
Wild dog	average	35	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Hyena-Spotted	average	35	Stable	Count Surveys by Community Game Guards, #MET & *NACSO
Hyena - Brown	abundant	150	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Caracal	abundant	450	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
African Wildcat	Abundunt	250	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Genet Cat	abundant	350	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Black Backed Jackal	abundant	1,000	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Porcupine	abundant	500 +	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Spring Hare & Rabbit	abundant	100 +	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Guinea Fowl	abundant	2,000 +	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Francolin	abundant	1,000 +	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Doves	abundant	10,000 +	upwards	Count Surveys by Community Game Guards, #MET & *NACSO
Prey species	Abundance: oryx, ostrich, Steenbuck, grey duiker, eland, kudu, guinea fowl, francolin, doves	10,000 +	upwards	Count Surveys by Community Game Guards, #MET & *NACSO

Eland	average	400	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Gemsbuck	average	400	stable	Count Surveys by Community Game Guards, #MET & *NACSO
SG Kudu	average	250	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Steenbuck	abundant	500	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Common Duiker	abundant	500	stable	Count Surveys by Community Game Guards, #MET & *NACSO
Warthog	average	200	Stable to down due to lack of permanent water points	Count Surveys by Community Game Guards, #MET & *NACSO

* NACSO – Namibian Association of Community Based Natural Resource Management Support Organization

MET – Ministry of Environment & Tourism

6. Total employment number: __5__

   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	6	2
Trackers	4	1
Anti-poaching scouts/rangers	9	9
Other anti-poaching		
Cooks/housekeepers	2	2
Community coordinators	1	1
Managers	2	1
Biologists		
Others: _____		

7. Number of staff employed in the off-season:

   5 x Camp Staff, 9 x anti-poaching Game Guards.

a. Please identify the number and type of staff that are engaged when the season is not open:

5 x Camp Staff, 9 x anti-poaching Game Guards

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	9	9	2018 to date
Managers	1	1	2018 to date
Maintenance	1	1	2018 to date
Road opening/construction			
Community relations personnel			
Others: Camp Staff	5	5	2018 to date

8. Anti-poaching efforts:[2]

a. Number of anti-poaching staff: __9__

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both

c. Months during which anti-poaching patrols are conducted: every month of the year

d. Number of anti-poaching patrols per month: Project staff carried out foot, vehicle, donkey patrols - for inaccessible areas

e. Description of anti-poaching equipment, vehicles, etc.: Patrol 4x4 cars and on foot, and donkey.

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Namibian Police and Game Department

g. Do you offer rewards to poaching informants leading to arrest? _x_ Yes __ No

h. Do you offer rewards to poaching informants upon conviction? _x_ Yes __ No

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in?

Type of expense	Spending 2018-N$	Spending 2019 -N$	Spending 2020 – N$	Remarks
Salaries for anti-poaching scouts	N$91,800 - N$850 per month x 9 scouts	N$91,800 - N$850 per month x 9 scouts	N$91,800 - N$850 per month x 9 scouts	
Equipment	N$20,000	N$20,000	N$50,000	
Vehicles	N$500,000 – Landcruiser pick-up	N$500,000 – Landcruiser pick-up	N$500,000 – Landcruiser pick-up	
Diesel	N$50,000	N$50,000	N$50,000	
Rewards paid				
Other:				
Other:				
TOTALS	N$661,800	661,800	691,800	

9. Anti-poaching results:

Category	2018	2019		Remarks
Poaching incidents discovered	7	0		Eland, Gemsbuck, Steenbuck, and spotted hyena poisoned
Elephant carcasses observed	0	0		No Elephant poached
Lion carcasses observed	N/A	N/A		No Lions
Leopard carcasses observed	0	0		None killed
Ivory poachers arrested	0	0		No Elephant poaching yet
Meat poachers arrested	1	0		Killed Eland cow
Other poachers arrested	2	0		Stole solar panels at PWWP
Poachers convicted	2	0		Prison sentence
Snares/gin traps collected	0	0		Poaching with dogs & horses. No snares used due to cattle in concession
Firearms confiscated	0	0		Dogs & Horses used
Vehicles confiscated	0	0		Dogs & Horses used
Bicycles confiscated	0	0		Dogs & Horses used
Boats/nets confiscated	0	0		Dogs & Horses used
Tusks recovered	N/A	N/A		No Elephants yet
Other:				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X__ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? _

Communities gets 100% of money contributed by Hunters for non-exportable game (Own Use Quota). The Donation for a Non-Exportable elephant is US$15,000 of which US$3,500 goes to the community, and the rest is used to establish PWWP's in the concession as wildlife water points is our primary development goal. Without water the concession is just a "Green Desert" because all surface water seeps into the sandy soil. Two non-exportable elephant is on quota yearly. The Communal fee is a contractual fee.

Our clientele is primarily USA citizens who donate SCI Blue Bags with school stationary supplies. Each hunter hunting in the conservancy donates between one and two SCI Blue bags with school stationary at a value of US$200 each bag. Hence a minimum of 5-10 SCI Blue Bags is donated at a value of N$13,500 to N$27,000. The SCI Blue Bag donations is a Voluntary fee.

c. Does the company provide game meat to nearby communities? X_ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:

All the game animals hunted by us per the allocated quotas of the Minister of Environment and Tourism, go to the local community of Ondjou.

Elephant x 4 on quota x 4,500 kg meat x N$22 per kg = N$396,000 worth of meat is distributed to the Ondjou Communities.

A list of all villages that need to receive meat is handed to the hunting operator by the Management Committee, and meat must be distributed within 24 hours after an animal is hunted. If not distributed within 24 hours after the hunt the contractual penalty fee is N$22 per kilogram meat. With elephant that is a fine of N$99,000 per elephant or US$7,300.

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.

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

The Ondjou Concession block is not a horticulture area, and very little crops are raised. Mainly cattle, goats, donkey, and horses are raised by community members.

When an elephant damages any property, problem elephant situations are raised by the local community and it is addressed with the Chairman of the Community. The chairman then reached out to the Minister of Environmental and Tourism, who investigates the Wildlife Human conflict, and approves the problem animal permit in writing when enough evidence is collected by the Ministry. The Chairman then reached out to the Hunting Operator to provide a client. If a suitable client is found, there is a certain time limit to hunt the animal and the permit will be issued with the client's details.

The Operator must pay the community a predetermined contractual fee for the problem animal, and the meat has to be distributed to villages on the meat delivery list as per contract

f. Please describe any consolation payments made to residents damaged by game species. What currency are the expenditures reported in?

There is a Government Fund that is supposed to refund the community for damages, however it is depleted. Thormahlen & Cochran Safaris pays the community members compensation agreed upon by the community, the hunting operator and the Minister of Environment and Tourism, when damage was done to keep the community from killing the animals.

Species	Damage caused	Consolation paid 2018	Consolation paid 2019	Consolation paid 2020
Elephant	Very little damage caused	N$0		
Lion	N/A – No Lion in Concession	N/A	N/A	N/A
Leopard	Goats, Calves, Donkey caught	N$0		
Wild Dogs	Calves & Goats caught	N0$		
Spotted Hyena	Cattle calves caught	N$0 due to hyenas being poisoned. Perpetrator arrested by MET		
Porcupine	Destroy the little crops there is.	N$0		
Caracal	Goats killed	N$0		
TOTAL DAMAGED CAUSED	**N$140,000**	N$0		

According to a report done by NACSO, there is human wildlife conflict, whereby hyena and wild dogs are the most troublesome and are responsible for the most incidents, followed by porcupine, leopard and caracal.

The cost of estimated human wildlife conflict cost on average, **is N$140 000 per year**.

The estimated poaching of high value species was none.

Natural resource benefits outweighed the conflict costs.

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____**Namibian$**_____

Type of project	Spending 2018	Spending 2019	Spending 2020	Remarks
Education e.g. School Stationary supplies	N$55,000	N$55,000	N$	20 blue bags @ $200 per bag = $4000, or N$55000. Clients donate $200, we fill-up the bag to the total of $200 with the necessary school or educational supplies, identified by the local schools.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Community scout Uniforms	N$40,500	N$		
Camp Staff Uniforms	N$33,500	N$		
Other community - Training of Camp Staff	N$75,000	N$		
Local government activities				
Water infrastructure improvements	N$204,000	N$		Maintain the borehole and insert solar pumps to establish * PWWP's.

Sports teams funded	N$5,000	N$5,000		
Trophy Hunting Camp material donated	N$1,174,495	N$		Full tented safari camp with en-suite bathrooms
Other: Airstrip Cleared	N$176,300	N$		Military airstrip cleared to charter clients into hunting area.
Other: Camp Staff Salaries	N$47,250	N$		
Casual Community Member Labor Salaries	N$280,000	N$		Used to built camp and clear airstrip
TOTALS	**N$2,091,045**	**M$**		

* PWWP's -Permanent Wildlife Water Points

INVESTMENT SUMMARY - 2018

UTILIZATION & DEVELOPMENT OF THE ONDJOU COMMUNITY

TOTAL SALARIES & TRAINING COST- 2016

Thormahlen & Cochran Safaris spent the following amounts on training and labour in 2018:

- **Training of Camp Staff-N$75,000**
- **Camp Staff Salaries – N$47,250**
- **Casual Labour Salaries – N$280,000**
- **Staff & Casual Workers Workwear Uniforms – N$33,500**

TOTAL COST – N$435,750

NOTE:

- Training Camp Staff – 3 staff x N$3,125 pm x 8 months
- Camp Staff Salaries – 3 staff x 9 months x N$1,750 ea
- Casual Labour – 20 casuals x 8 months @ N$1,750 ea
- Staff Uniforms – 3 x N$4,500 ea
- Casual Workers Equipment – N$1,000 ea

Casual Workers cleared the Trophy Hunting Campsite at Ondjou Conservancy where we built a Permanent Trophy hunting camp. The first trophy hunting Camp ever at Ondjou Conservancy.
Casual workers cleared a strip of bush and dug the trench for the water pipeline to the trophy hunting camp from Post 2, a distance of 3,5 kilometres.
The casual workers also cleared the Ondjou Airstrip which was overgrown for 28 years since the Namibian Bush War with South Africa. The airstrip is operational after 28 years and the first clients flied into Gam for their elephant hunt.

TOTAL WATER DEVELOPMENT COST - 2018

Thormahlen & Cochran Safaris donated diesel to Mooiplaas Post, Mangetti Post, and Otjijere Post so that the village members can pump water for the elephants. An average of 25 litre diesel was donated every week, hence 200 litre per village per month for 8 months.

We also donated a new Lister Pump to the community at Post 2 where the trophy hunting camps water is coming from.
A plastic Pipeline was laid from Post 2, to the trophy Hunting Camp. A total distance of 3,5 kilometres.
A 10,000 litre plastic tank on a 6 meter steel stand was erected at Post 2 to store the trophy hunting camp's water.
At the Trophy Hunting Camp two plastic Tanks (5,000 & 2,500 litre) was erected on steel stands.

TOTAL WATER DEVELOPMENT COST

- **Diesel to pump water for elephants – N$76,000**
- **Lister Pump Cost – N$16,000**
- **Plastic Pipe Cost – N$35,000**
- **Water tank 10,000 -N$9,700**
- **Water Tank 5,000 litre – N$4,700**
- **Water tank 2,500 litre – N$2,700**
- **Steel Tank stand 10,000 litre tank – N$37,000**
- **Steel Tank Stand 5,000 & 2,500 litres tanks – N$23,000**

TOTAL COST – N$204,000

NOTES:

- Diesel 200 litre x 3 villages x 8 months x N$16 per litre
- Plastic pipeline of 40 mm class 6 @ N$10 per meter x 3,500 meters

TOTAL CAMP DEVELOPMENT COST - 2016

- **Camp Material –N$650,000**
- **Camp Building Cost –N$240,000**
- **Tents & Equipment – N$284,495**

TOTAL COST – N$1,174,495

GAM AIRSTRIP REHABILITATION COST-2018

- Vehicle Cost -N$40,000
- Big Game PH Salary Cost – N$50,000
- Steel Wire to fence off Airstrip for Airplane Safety – N$33,000
- Anchor Poles – N$12,000
- Dropper Poles – N$21,700
- Trailer Rental -N$8,500
- Steel Gate – N$1,000
- Windsock -N$3,500
- Windsock steel post -N$1,000
- Cement -N$2,000
- Molopo Tree Poison – N$3,600

TOTAL AIRSTRIP COST – N$176,300

SCHOOL STATIONARY DONATIONS

TOTAL SCHOOL STATIONARY DONATED – N$55,000

TOTAL DEVELOPMENT / INVESTMENT – 2018:

A TOTAL OF N$2,091,045 was invested in Ondjou Conservancy

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

We operate in South Africa and Namibia, and the figures below, is for the whole operation. In Ondjou we only hunt what is allocated on quota, and it is fixed by the

Government. The Namibian Government, specifically the Minister of Environment and Tourism, set strict quotas at the beginning of every three years, revising it at the end of each year when the Hunting operator must submit a Hunting Report on that specific year. So, before the client arrives, the hunting operator must take out a hunting permit – and this is only available if it falls within the quota that was pre-approved.

Current Ondjou Trophy quota: 2 x trophy elephant, 2 x own use elephant, 4 x Steenbuck, 2 x caracal, 5 x jackal, 3 x kudu, 1 x leopard, 3 x ostrich, 4 x Oryx, 3 x warthog. 1 x duiker.

The table below is for the total of Thormahlen & Cochran's concessions:

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all other species
Number of U.S. clients	2015: 4 clients 2016: 9 2017: 5 2018: 4	2015: 2016: 2017: 2018: 1	2015: 2 clients 2016: 9 2017: 9 2018: 10	2015: 126 clients 2016: 110 2017: 141 2018: 83
Percentage of U.S. clients	2015: 99 % 2016: 98 % 2017: 100 % 2018: 98 %	2015: 2016: 2017: 2018: 100 %	2015: 100 % 2016: 98 % 2017: 99 % 2018: 100 %	2015: 95 % 2016: 96 % 2017: 97 % 2018: 95 %
Trophy fees paid by U.S. clients – US$	2015: $220,000 2016: $495,000 2017: $275,000 2018: $260,000	2015: 2016: 2017: 2018: $75,000	2015: $42,000 2016: $225,000 2017: $256,000 2018: $265,000	2015: $303,715 2016: $1,075,000 2017: $997,375 2018: $410,110

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:

    95%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

    Thormahlen & Cochran Safaris policy in our hunting blocks is:

    - to only hunt Leopard males of six years and older;
    - to only hunt Trophy elephant bulls of 47 years and older;
    - to only hunt elephant bulls in excess of 55 lbs tusks.

    This way we enhance the genetic trophy quality by hunting post-productive animals only.

Thormahlen & Cochran operates on other conservancies in Namibia, namely:
Na#Jaqna
Ondjou
Ozondundu
Otuzemba
Anabeb
Orupupa (2015-2017)
Otjambangu
Ombuijokanguidi
Okangundumba
Impalila
Kabulabula
We built trophy hunting camps in Na Jaqna, Ondjou, Anabeb, Impalila and Kabulabula.
Thormahlen & Cochran donate all the camps to the Conservancies.
We deliver all the meat that we hunt, to the conservancies, and
Donate to every local school school stationary SCI blue bags.
We are building roads and are responsible for the water and electricity supply for the camps.
We employ the local community as staff and currently employ 5 to 6 conservancy members per camp as staff.
We are also responsible for the training of the staff to be able to serve the overseas clients.
To date we have 32 community members employed in the various camps.
We also have social responsibilities towards the conservancies: we built a school hostel, a community hall, drilling of waterholes, making Cutlines, building roads etc.
Ondjou's camp was built in 2018 for **N$1,174,495**.
We are buying protective clothing to the game guards and uniforms for the personnel on an annual basis.
Two of the most significant benefits for the conservancy, is the cash income derived from the trophy hunting activities to cover its own running cost, and to invest in their social programs, and the yearly employment of its own community members.

14. I declare that the foregoing is true and correct.

Signature:

Name: FPJ Thormahlen Title: Mr

[EXTERNAL] Permit # 85830C - Earl Bentz hunting permits

Aimee Korver <permits@conservationforce.org>

Tue 6/30/2020 3:15 PM

To: Brisendine, Amy <amy_brisendine@fws.gov>

1 attachments (678 KB)

Scan_2020-06-30-140254852.pdf;

Ms. Brisendine,

Please include the hunting permits attached with Mr. Earl Bentz import permit application # 85830C.

Please let me know if you have any questions.

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		
VALID FROM:		
VALID TO:		
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: ...

Residential Address: ...

Country: ...

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common		Springbok		Other	
Buffalo		Klipspringer		Steenbok			
Crocodile		Kudu		Warthog			
Dik-Dik		Lechwe		Waterbuck			
Eland		Oryx (Gemsbok)		Wildebeest, Black			
Elephant		Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck		Zebra Burchell's			
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: ...

Guided by (name of guides): ...

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way and is not transferable.

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
09/09/15	Elephant								Male	Golden Conservancy		[redacted]	(b) (6)	

*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. 1018-0184
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

01/09/2018

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

B

RCVD JAN 17 2018

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Campagna	Jeffrey	D	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)	[redacted]	

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6) [redacted]			(b) (6) [redacted]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Moline	IL	61265	Rock Island county	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
same

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the [redacted] may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

1-9-18

mped 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:_____(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:

   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: Zimbabwe, South-East, Masvingo Province, 21,29'53 S"/30,47'02 E", Nuanetsi Ranch, Masvingo
   July 03, 2014
   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 Panels, 2 Feet, 1 Tail, 2 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 document]:

      733 Iona Close, Harare, Borrowdale, BW957, 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	Safari Air Services
Name: Address:	
Address:	733 Iona Close
City:	Harare
State/Province:	Borrowdale
Country, Postal Code:	BW957 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. 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 signatu (b) (6) Date: 1-9-18

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):

Jeff Campagna (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.

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,

(b) (6) [redacted]

Kenneth Shives

(b) (6) [redacted] Princeton NJ, 08540

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Shives	Kenneth	Stuart	-

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room # - no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Princeton	NJ	08540	Mercer	USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)
same as above

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 04/16/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same as on Page 1
   (b) (6) [redacted]
   Princeton, NJ 08540 USA

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Kenneth Shives (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit. N/A

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   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
Emmanuellan 7
Machelen 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
Compas International Movers
Business Name:
Address: Emmanuellan 7
City: Machelen
State/Province:
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 spot 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 thophy 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: _____ (b) (6) _____ 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).

COMMUNAUTÉ EUROPÉENNE / *EUROPEAN UNION*

1 ORIGINAL

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*

ANNEXE AU PERMIS / CERTIFICAT – *ANNEX TO PERMIT / CERTIFICATE:*

N° / *No*: **2017/BE14000/PX**

☐ INVOER IMPORT ☐ UITVOER EXPORT ☑ WEDER-UITVOER RE-EXPORT ☐ OVERIGE: OTHER:

2. Dernier jour de validité / *Last day of validity*: **21-JUN-2018**

B 1

8. Description des spécimens (marques, sexe, date de naissance des animaux vivants) / *Description of specimens (incl. marks, sex, date of birth for live animals)*:
CODE: TRO
GENDER: 0,0,0
BIRTH DATE: /
ADDITIONAL INFORMATION: Shoulder Mount with Horns

9. Masse nette (kg) / *Net mass (kg)*: **20**

10. Quantité / *Quantity*: **1 pce**

11. Annexe CITES / *CITES Appendix*: **II**

12. Annexe CE / *EU Annex*: **B**

13. Origine / *Source*: **W**

14. Objet / *Purpose*: **P**

15. Pays d'origine / *Country of origin*: **Tadjikistan**

16. N° de permis / *Permit No*: **M11000111TJ**

17. Date de délivrance / *Date of issue*: **30/01/2013**

18. Pays de dernière réexportation / *Country of last re-export*:

19. N° du certificat / *Certificate No*:

20. Date de délivrance / *Date of issue*:

21. Nom scientifique de l'espèce / *Scientific name of species*: **Ovis ammon**

22. Nom commun de l'espèce / *Common name of species*: **Argali**

C

8. Description des spécimens (marques, sexe, date de naissance des animaux vivants) / *Description of specimens (incl. marks, sex, date of birth for live animals)*:
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

9. Masse nette (kg) / *Net mass (kg)*: **43.66**

10. Quantité / *Quantity*: **2 pce**

11. Annexe CITES / *CITES Appendix*: **II\I**

12. Annexe CE / *EU Annex*: **B\A**

13. Origine / *Source*: **W**

14. Objet / *Purpose*: **P**

15. Pays d'origine / *Country of origin*: **Namibie**

16. N° de permis / *Permit No*: **0043048**

17. Date de délivrance / *Date of issue*: **01/08/2014**

18. Pays de dernière réexportation / *Country of last re-export*:

19. N° du certificat / *Certificate No*:

20. Date de délivrance / *Date of issue*:

21. Nom scientifique de l'espèce / *Scientific name of species*: **Loxodonta africana**

22. Nom commun de l'espèce / *Common name of species*: **African Elephant**

8. Description des spécimens (marques, sexe, date de naissance des animaux vivants) / *Description of specimens (incl. marks, sex, date of birth for live animals)*:

9. Masse nette (kg) / *Net mass (kg)*:

10. Quantité / *Quantity*:

11. Annexe CITES / *CITES Appendix*:

12. Annexe CE / *EU Annex*:

13. Origine / *Source*:

14. Objet / *Purpose*:

15. Pays d'origine / *Country of origin*:

16. N° de permis / *Permit No*:

17. Date de délivrance / *Date of issue*:

18. Pays de dernière réexportation / *Country of last re-export*:

19. N° du certificat / *Certificate No*:

20. Date de délivrance / *Date of issue*:

21. Nom scientifique de l'espèce / *Scientific name of species*:

22. Nom commun de l'espèce / *Common name of species*:

	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		

Signature et cachet officiel / *Signature and official stamp:*

DE BELGISCHE-KONINKRIJK

Nom du fonctionnaire chargé de la délivrance / *Name of issuing official:*
Grégoire Isabelle

Lieu et date de délivrance / *Place and date of issue:*
Bruxelles, 21-DEC-2017

RE-EXPORT

Original

IMPORT

OTHER:

2. Valid until: 01/02/2015

3. Importer (name and address)
Kenneth Shives
(b) (6) [redacted]
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 & 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 ENVIROMENT 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 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. 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 & 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 propated for commercial purposes
*** for pre-Convention specimens

13.THIS PERMIT IS ISSUED BY: J. Shapi

Windhoek — Place

01/08/2014 — Date

MINISTRY OF ENVIRONMENT & TOURISM
CUSTOMS & EXCISE
EXPORT No 14
19 -11- 2014
Hosea Kutako International Airport
REPUBLIC OF NAMIBIA

Security stamp, signature and official seal

14. EXPORT ENDORSEMENT:

15. Bill of Landing / Air Waybill Number:

Block	Quantity
A	2 (TWO)
B	3 (THREE)
C	
D	

HAIR — Port of Export / Re-export

19.11.14 — Date

Signature

Official stamp and title

Original

Namprint: 2308

2

COPIE destinée au titulaire

1. Exportateur/réexportateur

A.CILLIERS
P.O. BOX 214
Pour le compte de Kenneth SHIVES

GROOTFONTEIN
Namibie

PERMIS
- [x] IMPORTATION
- [ ] EXPORTATION
- [ ] RÉEXPORTATION
- [ ] AUTRE:

N° FR1407527546-I

3. Importateur

SHIVES Kenneth
3 Rue Alfred Bruneau

75016 PARIS
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

DRIEE ILE-DE-FRANCE

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)

TRO

9. Quantité nette: *****

10. Nombre de spécimen: 1

11. Annexe CITES	12. Annexe UE	13. Origine	14. Objet
II	B	W	P

15. Pays d'origine

Namibie

16. Numéro du permis: 0043048

17. Date du permis: 01/08/2014

18. Pays de dernière réexportation: *****

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 (IATA).

24. La documentation de (ré)exportation délivrée par le pays de (ré)exportation

- [ ] a été présentée à l'autorité de délivrance
- [x] 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. [x] L'importation [ ] L'exportation [ ] 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/de la lettre de transport aérien:

27. Réservé à la douane

Quantité/masse nette (kg) réellement importée ou (ré)exportée	Nombre d'animaux morts à l'arrivée
1	

Document douanier
Type: IMA
Numéro: 440 98C32
Date: 10/12/14

DOUANES FRANÇAISES
R&F
10 DEC 14

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.:	137271
VALID FROM:	05 / 08 / 2013
VALID TO:	26 / 08 / 2013

PERMIT TO HUNT FOR TROPHIES

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

To (name): K. Shives

Residential address: .....

Postal address: U.S.A.

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
	Buffalo	1X
CITES I	Crocodile	
	Dik-dik	
	Eland	
CITES II	Elephant	1X Mankard 2013/3/19
	Giraffe	
	Grey Duiker	
CITES ~~X~~	Hippopotamus	1X
	Impala, black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	1X
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
	Zebra, Hartman's mountain	
CITES II	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
	Reedbok	1X
	*Please report back within 48 hours after Shooting	

on the following farms / hunting concessions: Bwabwata east

Guided by (name of guide/Safari Company/Guest farm): A. Cilliers & W. Cilliers

Cashier receipt No.: MET 26023

Issued on 06 / 03 / 2013

Amount received: N$ 100-00

P. Ndaxwala

Authorizing officer

Official MET date stamp
MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
06 MAR 2013
Private Bag 13306, Windhoek
Tel: 2842111 • Fax: 258851

IMPORTANT: This permit is not valid if altered in any way.

prime press 062009

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			Barbarosa Estate	[redacted] (6) (6)	
11/8/13	Elephant							A	M			Barbarosa Estate		
15/8/13	Buffalo	212.5		33	33	278		A	M			Barbarosa Estate		
								Circm	Circm					
	TUSK MEASUREMENTS			OUTSIDE CURVE		INSIDE CURVE		BASE	CENTRE	Lip to Base	Weight.			
		Left		185 cm		146 cm		39,5	40,5	70 cm	21,76 kg.			
		Right.		162 cm		140,5 cm		39,3	41,5	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 Kimberley. 12/8 and 12/8.

Barry, Anna <anna_barry@fws.gov>

Kenneth Shives PRT #86313C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Jun 26, 2018 at 9:25 AM
To: (b) (6)

Dear Mr. Shives,

As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

The Service is continuing to monitor the status and management of these species in their range countries. We will review each application received for import of sport-hunted trophies and evaluate the information provided in the application as well as other information available to us regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. Therefore, your application is currently reviewed.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT *You may have noticed that our* ***application forms expired 5/31/2017****. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

Kenneth Shives PRT #86313C

Barry, Anna <anna_barry@fws.gov> Tue, Jun 26, 2018 at 2:14 PM
To: Kenneth Shives (b) (6)

Yes, the application is still under review and no I do not have a time frame for the application to be finalized.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Tue, Jun 26, 2018 at 1:48 PM, Kenneth Shives (b) (6) wrote:

> Dear Anna,
> Thank you for your note.
> Just so I understand, the application is still being reviewed? Do you have any estimate on the timing to complete the review?
> Warm regards,
> Kenneth
>
> Kenneth Shives
> PwC
> (b) (6) , New York, NY 10017
> (b) (6)
>
> On Jun 26, 2018, at 9:25 AM, Barry, Anna <anna_barry@fws.gov> wrote:
>
> Dear Mr. Shives,
>
> As background, on March 1, 2018, in response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service (Service) informed the public that it is revising its procedure for assessing applications to import certain sport-hunted species. We have withdrawn our countrywide enhancement findings for a range of species across several countries, including elephants and lions. In their place, we intend to make findings for trophy imports on an application-by application basis.

Barry, Anna <anna_barry@fws.gov>

Re: [EXTERNAL] Fwd: Apr 19 2018 3:45:00; Acknowledgement letter for Permit No. "86313C""

2 messages

Management Authority, FWHQ <managementauthority@fws.gov> Tue, May 29, 2018 at 6:58 AM
To: Kenneth Shives (b) (6)
Bcc: anna_barry@fws.gov

Your application, 86313C, that was received on 4/19/18, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

Thank you,
U.S. Management Authority, Branch of Permits.

We appreciate your time and consideration.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****
Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Thu, May 24, 2018 at 7:58 AM, Kenneth Shives <(b) (6)> wrote:

> Hello,
> I was just checking in on the progress of my permit application. My export permit from Belgium expires 21 June so was hoping this could be completed before then to avoid having to request another CITES export certificate.
> Thank you in advance for your consideration.
> Kind regards
> Kenneth
>
> Kenneth Shives
> PwC
> (b) (6), New York, NY 10017
> (b) (6)
>
> Begin forwarded message:

From: SPITS-II Production Email Messenger <permits@fws.gov>
Date: April 19, 2018 at 9:45:02 PM GMT+2
To: (b) (6) >
Cc: <permits@fws.gov>
Subject: Apr 19 2018 3:45:00; Acknowledgement letter for Permit No. "86313C""
Reply-To: <permits@fws.gov>

KENNETH STUART SHIVES
(b) (6)
PRINCETON, NJ 08540
U.S.A.

***This is an automatically generated email, please do not reply to this message**

***For questions please send an email directly to managementauthority@fws.gov ***

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 04/19/2018; check number 274 accompanied the application for AFRICAN ELEPHANT. Your application has been assigned the following PRT identification number: MA86313C-0While 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 notification to make any inquiries. Should you have additional information that you need to provide to our office pertaining to the current request, we ask that you call our office first at 800-358-2104 or email managementauthority@fws.gov to obtain further instructions.

Management Authority, FWHQ <managementauthority@fws.gov> Thu, Aug 30, 2018 at 1:08 PM
To: Kenneth Shives (b) (6) >
Bcc: anna_barry@fws.gov

Mr. Shives,

Your application is still under review and we cannot provide you a time frame. Rest assured that your application is still with us and is being reviewed in accordance with the parameters set forth in the Circuit Court opinion of March 1 of which you have been informed in a previous email. We appreciate your patience in this matter.

****

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!
Going abroad? Be Informed. Buy Informed.
****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Thu, Aug 23, 2018 at 8:40 AM, Kenneth Shives <kenneth.shives@yahoo.com> wrote:

> Hello,
> I am just writing to checking in the status of this application.
> Any update would be great appreciated.
> Thank you.
> Kenneth
>
> Kenneth Shives
> PwC
> (b) (6) New York, NY 10017
> (b) (6)
> [Quoted text hidden]

Barry, Anna <anna_barry@fws.gov>

Kenneth Shives PRT #86313C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Nov 13, 2018 at 10:56 AM
To: Kenneth Shives (b) (6)
Cc: "Management Authority, FWHQ" <managementauthority@fws.gov>

Dear Mr. Shives,

We apologize for the delay in finalizing your application but because each application now requires an individual finding under the Endangered Species Act, all application (new and ones submitted for renewal) cannot be finalized until this review process has been finalized.

I will contact you when the application is submitted to my supervisor for final review and signature.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

Kenneth Shives PRT #86313C

Kenneth Shives (b) (6) > Wed, Nov 14, 2018 at 5:06 PM
To: "Barry, Anna" <anna_barry@fws.gov>
Cc: "Management Authority, FWHQ" <managementauthority@fws.gov>

Thank you so much Anna for the update!
Kind regards
Kenneth

Kenneth Shives
PwC
(b) (6) , New York, NY 10017
(b) (6)
[Quoted text hidden]

Barry, Anna <anna_barry@fws.gov>

Kenneth Shives PRT #86313C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Apr 9, 2019 at 10:27 AM
To: Kenneth Shives (b) (6) >
Cc: "Management Authority, FWHQ" <managementauthority@fws.gov>

Dear Mr. Shives,

These applications are still under review.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Wed, Apr 3, 2019 at 12:11 PM Kenneth Shives (b) (6) wrote:

> Hello Anna,
> Has there been any progress on my application?
> Thank you,
> Kenneth
>
> Kenneth Shives
> PwC
> (b) (6) , New York, NY 10017
> (b) (6)
>
> On Nov 13, 2018, at 10:56 AM, Barry, Anna <anna_barry@fws.gov> wrote:
>
> Dear Mr. Shives,
>
> We apologize for the delay in finalizing your application but because each application now requires an individual finding under the Endangered Species Act, all application (new and ones submitted for renewal) cannot be finalized until this review process has been finalized.

I will contact you when the application is submitted to my supervisor for final review and signature.

Sincerely,

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

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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

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Wickas	Louis	John	III

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)		N/A	(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

2. Tax identification no.	3. Description of business, agency, Tribe, or institution		

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Gallipolis	Ohio	45631	Gallia	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
Same as Above

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17US55820C/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

FEB 12, 2018

(b) (6) (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: N/A (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: One (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:

   Sentinel Limpopo Safaris, Wape Ranch, Mwenezi, Masvingo Province, Zimbabwe
   21°59'13.25"S, 30°53'37.13"E

   b. Date wildlife is to be hunted:

   September 14, 2018-September 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).

Tusks, Hide, Ears, 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	Collett's Wildlife Artistry
Name: Address:	15 Josiah Chinamano Road
Address:	
City:	Bulawayo
State/Province:	Belmont
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. 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: FEB 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.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):

Louis J. Wickas (b) (6) Gallipolis, Ohio 45631
(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):

Louis J. Wickas, (b) (6) Gallipolis, Ohio 45631
(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.

SENTINEL LIMPOPO
S A F A R I S
P.O. BOX 45, BEIT BRIDGE, ZIMBABWE CELL: +27 83 254 0775 / +27 83 285 0064 EMAIL: HOP 0101

Mr Lou Wickas
(b) (6)
Gallipolis, OHIO, 45631 USA

Date: 20 January 2018

Dear Lou

RE: INVITATION TO HUNT

This letter serves to confirm that you have booked to stay with Sentinel Limpopo Safaris on Wape Ranch, Mwenezi, in September 2018 to hunt Elephant (M), Leopard (M), and Buffalo (M) and other Plainsgame species.

We confirm your itinerary as follows:

- You will be met in Bulawayo (BUQ) on 13 September 2018 and travel by road to Wape Ranch, Mwenezi.
- Your hunt (14 days) will take place from 14-27 September 2018.
- We will return you to Bulawayo on 28 September 2018 from where you will start your return journey to the United States.

With reference to the CITES listed species you will be hunting (Elephant and Leopard) please rest assured that

a) A quota for each of these species has been applied for and approved by the Zimbabwe National Parks and Wildlife Management Authority, specific to Wape Ranch, and that your hunt is within the confines of said quota, and
b) Your daily rate and trophy fees for your hunt go directly towards the maintenance and conservation of the animals and the natural habitat of the 6,000Ha property on which you will be hunting. These funds are used to maintain electric fences (designed to meet Veterinary-specifications to contain FMD Buffalo), to maintain and operate a number of waterpoints and to equip and provide for a 5-man anti-poaching team year round. Elephants numbers in particular must be controlled/ reduced, as at present numbers, they exceed the carrying capacity of the ranch, and do a great deal of damage to infrastructure (waterpoints, pumps and external fences) and have a visible negative impact on large indigenous tree species (Albizia breviflora, Acacia senegal, Commiphora merkeri, Combretum imberbe, Commiphora tenuipetiolata, Acacia xanthophloea, Hyphaene petersiana, Sclerocarya

birrea, Kirkia acuminata, Ficus sycamorous and Colophospermum mopane, to name a few). Without creating a value through hunting, these animals would more than likely have to be culled.

We thank you for booking your hunt with Sentinel Limpopo Safaris, and look forward to sharing the campfire with you once again.

Kind regards

VANESSA B BRISTOW
DIRECTOR - SENTINEL LIMPOPO SAFARIS (Reg. No. HOP0101)

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
17US55820C/9

2. Valid
09/27/2018

3. Permittee (name and address, country)
LOUIS JOHN WICKAS III
(b) (6)
GALLIPOLIS, OH 45631
U.S.A.

4. Consignor (name and address, country)
COLLETT'S WILDLIFE ARTISTRY
15 JOSIAH CHINAMANO ROAD
BELMONT
BULAWAYO
ZIMBABWE

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

U.S. CITES Management Authority

09/28/2017
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 NO 12. Country of Origin ZIMBABWE
B. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
C. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
D. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
E. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]

726257

February 12, 2018

U.S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of permits, MS:IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Louis J. Wickas
Form 3-200-19

Clarification of Answer, Section E, Note 1

A copy of a valid but previously unused permit is being submitted, **instead of the original** because the original was submitted with another application being submitted this year.

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry Prt # 77862C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Fri, Oct 4, 2019 at 10:23 AM
To: (b) (6)

Louis,

On **02/21/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt #77862C**. At the me of the applic aon' s submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

***Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] Re: Elephant Withdrawal Inquiry Prt # 77862C

1 message

Louis J. Wickas (b) (6) Fri, Oct 4, 2019 at 4:42 PM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>

Hello Tim,

Thank you for your letter.

Yes, I successfully hunted an African Elephant. I believe the harvest occurrerd Sept 24, 2018 at Sentinel Limpopo Safaris, Wape Ranch, Mwenezi, Masvingo Province, Zimbabwe.
The tusks have been certified by the Zimbabwe Government as a legal harvest with a Zimbabwe Game agent in attendance. The trophy is currently in Lock up at Collett's Wildlife Artistry Taxidermist at the address indicated on my application.
If I can provide any further information, please do not hesitate to contact.

Sincerely,

Lou Wickas

----- Original Message -----
From: MacDonald, Tim
To: (b) (6)
Sent: Friday, October 04, 2019 10:23 AM
Subject: Elephant Withdrawal Inquiry Prt # 77862C

Louis,

On **02/21/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt #77862C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

***Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

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Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 22 2018 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Howard	Gary	W	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Middleton	Idaho	83644	Canyon	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 acc(b) (6) [redacted] nd that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

3-15-18

Signature of [redacted] ied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service. N/A

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
GARY HOWARD
(b)(6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit. N/A

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name. 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
   KUNENE REGION OPUWO TOWN
   CONSESSION - OZUNDUNDU CONSERVANCY

   b. Date wildlife was hunted:
   HARVESTED 11/12/2016

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
THORNHILL AND COCKRAN 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]:
YELLOW SHARK HOLDINGS (PTY) LTD P.O. BOX 81413, WINDMILL PARK. UNIT 7, DANTE STREET, PROSPERITA, WINDHOAK, 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). 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: CAROL ALBERS / MR ANTON MUNHARDT ALBERTS
Business Name: THORNHILL AND COCKRAN SAFARIS
Address: P.O. BOX 90911 KLEIN HOOK 4000
City: WINDHOAK
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?
18,500 DOLLARS OF WHICH THE COMMUNITY GETS 12,500 DOLLARS.

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

(b) (6)

Applicant's signature: _____ Date: 3-15-18

Be aware that there may be addit[redacted]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).

Gary Howard Elephant Hunt Conservation information

I have nothing formal to provide except that the Hunt cost $18,500.00 Of that the Community receives $12,500.00

In conversations from the hunt with Concession managers, Community Game Scouts and Professional Hunters I came to the following conclusions which may or may not be correct as communications with broken English make it hard at times to understand;

The government and communities only allow harvest of elephants if the population is healthy and sustainable for the concession.

The government of Namibia in coordination with Communities (this would be local and regional indigenous people) created the Concessions and Conservancies within.

The Community along with its leaders elects representatives from their areas within concessions to represent themselves in regards to wildlife and wildlife protection. The Community also elects game scouts who must accompany and be with all hunters when they harvest any animal and fill out appropriated information in regards to the harvest. This information is submitted to the communities and governments responsible parties.

Poaching is taken very seriously, while I was there two poachers were arrested when caught by a professional hunter and game scout. Government officials were contacted and the poachers were arrested and taken to jail to await trail for shooting a Kudu without a permit. Locals are only allowed to harvest an animal if they have a permit to do so.

The money that goes to the community helps to pay for game scouts and management of the concession and the animals within the concession. Much like hunting licenses and tags support wildlife in the United States.

Barry , Anna <anna_barry@fws.gov>

Gary Howard PRT #83083C

1 message

Barry , Anna <anna_barry@fws.gov> Mon, Apr 16, 2018 at 4:46 PM
To: (b) (6) [redacted]

Dear Mr. Howard,

In response to a recent D.C. Circuit Court opinion, the U.S. Fish and Wildlife Service is revising its procedure for assessing applications to import certain hunted species like African elephants. We are withdrawing our countrywide enhancement findings for a range of species across several countries. In their place, the Service intends to make findings for trophy imports on an application- by-application basis. Please be aware that we continue to seek additional information directly from the relevant foreign Government Authorities to support our permit findings, therefore, applications are still under review.

Sincerely

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT You may have noticed that our application forms expired 5/31/2017 . The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted. We do not accept applications via fax or e-mail.

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

Gary Howard PRT #83083C

Barry, Anna <anna_barry@fws.gov> Mon, Jun 18, 2018 at 3:56 PM
To: Gary Howard (b) (6)

Dear Mr. Howard,

These applications are still under review.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT* You may have noticed that our **application forms expired 5/31/2017. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

On Mon, Jun 18, 2018 at 3:39 PM, Gary Howard <GHoward@thewetlandsgroup.com> wrote:

> Hello Anna, just checking in to see if there is any progress on my Elephant

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

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	1.b. First name	1.c. Middle name or initial	1.d Suffix
Benben	Michael	Norman	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)		(b) (6)	

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	N/A

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
N/A	N/A

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
N/A	N/A	N/A	

5. Principal officer title	6. Primary contact name
N/A	N/A

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
N/A	N/A	N/A	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Racine	WI	53402	Racine	USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)
Same - contact (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 ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: from 1989- don't know number No ☐

3. C[illegible] and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ap[illegible] ***l of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the b[illegible] d that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

3/14/2018

S[illegible] sponsible 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:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: Zimbabwe, Matabeleland South, Bubye 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, Tusks and 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 Stat

Applicant's signat (b) (6) 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 N. Benben cell: (b) (6)
email: [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.

Dziwulski, Kara <kara_dziwulski@fws.gov>

[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 aquire 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 N. Benben
(b) (6)

2 attachments

USF&WL letter - Benben - Page 1.pdf
2910K

ATT00001
1K

Michael (Tue, Oct 9, 2018 at 7:39 AM
To: Kara_dziwulski@fws.gov
b
)
(
6
)

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 N. Benben
(b) (6)
(b) (6)

Sent from my iPhone
[Quoted text hidden]
> <USF&WL letter - Benben - Page 1.pdf>
>
>
> Sent from my iPhone

BUBYE VALLEY CONSERVANCY
ZIMBABWE

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

12th August 2018

US Fish & Wildlife Authorities.

To Whom it May Concern.

Benefits of Elephant Hunting : Bubye Valley Conservancy , Zimbabwe

The Bubye 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 km2 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.

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] Re: Elephant Withdrawal Inquiry Prt # 83088C

1 message

(b) (6) > Fri, Oct 4, 2019 at 10:56 AM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>

Tim MacDonald
I am responding to your email request for more information on CITIES PERMIT #830-88C.
I DID successfully harvest an African elephant bull on May 29, 2018.
The elephant was harvested on the BUBYE VALLEY CONSERVANCY ((BVC) in Zimbabwe, Africa.
Previously I have submitted to Kara Dziwulski (ie. a letter from the BVC stating their wildlife goals, money usage and meat utilization).
If you need any more info please feel free to reach out to me.
Thank you,
Mi(b) (6)en
(b) (6)

Sent from my iPhone

On Oct 4, 2019, at 9:13 AM, MacDonald, Tim <tim_macdonald@fws.gov> wrote:

Michael,

On **03/22/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 83088C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and fees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry Prt # 83088C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Fri, Oct 4, 2019 at 10:13 AM
To: (b) (6)

Michael,

On **03/22/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 83088C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

Re: [EXTERNAL] Re: Elephant Withdrawal Inquiry Prt # 83088C

Michael (b) (6)
Thu 8/20/2020 10:41 AM

To: MacDonald, Tim <tim_macdonald@fws.gov>

Tim
Forgot to enclose my number. #380-88C

Sent from my iPhone

> On Aug 18, 2020, at 2:55 PM, Michael (b) (6) rote:
>
> Tim
> I just noticed my error on the date of my elephant harvest. It was actually May 29, 2018.
>
> Sent from my iPhone
>
>> On Aug 18, 2020, at 2:06 PM, Michael (b) (6) wrote:
>>
>> Tim
>> I'm just sticking my head in the door. Wondering if anything is happening with import permits (CITIES) for an elephant that I harvested May 29, 2020 on the Bubye Valley Conservancy in Zimbabwe Africa.
>> Thanks for any update,
>> Michael N. Benben
>>
>> Sent from my iPhone
>>
>>> On Feb 14, 2020, at 10:21 AM, Michael (b) (6) wrote:
>>>
>>> Tim
>>> I'm curious if under review means that some permits are being issued? Or is everything frozen? Anything else I can do/provide?
>>> Thank you for such a quick response.
>>> Michael N. Benben
>>>
>>> Sent from my iPhone
>>>
>>>> On Feb 14, 2020, at 10:16 AM, MacDonald, Tim <tim_macdonald@fws.gov> wrote:
>>>>
>>>> Michael,
>>>>
>>>> All elephant trophy import permits are still under review.
>>>>
>>>> Thank you,
>>>>
>>>> Tim MacDonald
>>>> Government Information Specialist

> > > > 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
> > > >
> > > >
> > > >
> > > > _____
> > > > From: Michael (b) (6)
> > > > Sent: Friday, February 14, 2020 10:58 AM
> > > > To: MacDonald, Tim
> > > > Subject: [EXTERNAL] Re: Elephant Withdrawal Inquiry Prt # 83088C
> > > >
> > > > Tim
> > > > I'm just following up on the current status of my African Elephant import permit after our last Emails from October 4, 2019.
> > > > Thank you,
> > > > Michael N. Benben
> > > >
> > > > Sent from my iPhone
> > > >
> > > > On Oct 4, 2019, at 9:56 AM, Michael (b) (6) wrote:
>
> > > > Tim MacDonald
> > > > I am responding to your email request for more information on CITIES PERMIT #830-88C.
> > > > I DID successfully harvest an African elephant bull on May 29, 2018.
> > > > The elephant was harvested on the BUBYE VALLEY CONSERVANCY ((BVC) in Zimbabwe, Africa.
> > > > Previously I have submitted to Kara Dziwulski (ie. a letter from the BVC stating their wildlife goals, money usage and meat utilization).
> > > > If you need any more info please feel free to reach out to me.
> > > > Thank you,
> > > > Michael Norman Benben
> > > > (b) (6)
> > > > or
> > > (b) (6)
> > >
> > > > Sent from my iPhone
> > > >
> > > > On Oct 4, 2019, at 9:13 AM, MacDonald, Tim <tim_macdonald@fws.gov<mailto:tim_macdonald@fws.gov>> wrote:
> > > >
> > > > Michael,
> > > >
> > > > On 03/22/2018 an application for the importation of an African Elephant, sport hunted trophy was

received by this office Prt # 83088C. At the time of the application's submission the hunt was to be held at a future date.
>>>> Please confirm at this time if you successfully hunted the elephant. If yes, please state so, and provide the date and location the elephant was taken.
>>>> If no, do wish to withdraw your application at this time?
>>>> Please confirm the current status.
>>>>
>>>> ***Please note the permit that was applied for was for a specific location, and date. Permit applications and fees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new application.
>>>>
>>>>
>>>>
>>>> Thank you,
>>>>
>>>> Tim Mac Donald
>>>>
>>>> Government Information Specialist
>>>> 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
>>>>
>>>>

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

RCVD APR 23 2018 LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Williams	Ronald	Edward	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6) [redacted]			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	N/A

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
N/A	N/A

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
N/A	N/A	N/A	

5. Principal officer title	6. Primary contact name
N/A	N/A

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
N/A	N/A	N/A	N/A

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Midland	TX	79707	Midland	USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)
N/A

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
N/A	N/A	N/A	N/A	N/A

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other [illegible] that the information submitted in this application for a permit is complete and accurate to the [illegible] herein may subject me to the criminal penalties of 18 U.S.C. 1001.
(b) (6) [redacted]
4-18-2018
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Loxodanta - 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:

   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): Nakobolelwa Conservancy
   Katima Mulilo

   b. Date wildlife was hunted:

   September 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).

Skull, Tusks, Skin, feet, Tail, 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: C.G. Kruger
Business Name: Omujeve Safaris
Address: Ongombo West Section 2
Address: Number 56
City: Windhoek, 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: 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 [redacted] raw ivory, once imported into the United States, cannot be re-exported

(b) (6)

Applicant's signature: [redacted] Date: 4-18-2018

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

N/A

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Ronnie E Williams (b) (6) [redacted]

(b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 27 2018 LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
OLIVER	ROBERT	GORDON	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
TERREBONNE	OR	97760	DESCHUTES	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.

Sig[redacted] (b) (6) [redacted] amped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   LOXODONTA AFRICANA

   b. Sex (if known).
   MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   ZIMBABWE, NGAMO/SIKUMI FOREST, VICTORIA FALLS

   b. Date wildlife is to be hunted:
   23 SEPTEMBER — 07 OCTOBER, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   MARTIN PIETERS SAFARIS

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). I DO NOT CURRENTLY HAVE PERMITS IN HAND. BEING APPLIED FOR BY MARTIN PIETERS SAFARIS
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name:
   Business Name:
   Address:
   City:
   State/Province:
   Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?
   REFER TO LETTER FROM HON. E.D. MNANGAGWA, PRES ZIMBABWE TO PRESIDENT TRUMP DATED 6 DECEMBER 2017

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
   SEE ENCLOSED CONTRACT FOR PIETERS WITH THIS INFORMATION

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
   PART OF THE FEES PAID ARE USED:
   1. FOR FUNDING TO ASSIST ANIMAL CONSERVATION
   2. FOR ANTI POACHING EFFORTS
   3. COMMUNITY IMPROVEMENT
   4. MOST OF THE ANIMAL WILL BE DISTRIBUTED TO LOCAL FOLK FOR FOOD

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature [redacted] Date: MARCH 22, 2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

President
State House
Harare
Zimbabwe

6 December 2017

His Excellency, Mr Donald Trump
President of the United States of America
1600 Pennsylvania Ave.
Washington, D.C. 20 006

RE: CONSERVATION OF ZIMBABWE'S ELEPHANT

On behalf of the people and Government of Zimbabwe, and indeed on my own behalf, I write to express profound appreciation for the US Fish and Wildlife Service determination that Zimbabwe's elephant conservation programme warrants the issuance of import permits in the United States of America after nearly three years. The conservation of elephant and other wildlife species in Zimbabwe is based on sustainable use and approach, much like the user-pay system in North America or the North American Model of Conservation. It is imperative that American safari hunters be permitted to bring their trophies home for the success of our conservation programme

Your Excellency, Zimbabwe has the second largest elephant population in Africa and the most up-to-date national elephant action plan which includes four regional plans. We need the participation of American hunters for revenues needed for management and to better control poaching. Importantly, our rural communities working with our Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) programme need the support and incentives as well. Elephants will only survive in the long term if they are more valuable to people than their damage to alternative forms of land use, such as subsistence farming.

Furthermore, without a way of benefitting from the elephants, they are regarded as a liability and economic cost to poor rural communities, who suffer crop losses, other damages and loss of human life. Consequently, the

most effective strategy to prevent this displacement is to integrate elephants into rural economies as assets and to demonstrate that elephants contribute to the welfare and development of people. The involvement and empowerment of rural people in natural resources management, in combination with economic and financial incentives through sustainable use, capacity building and skills development, have been driving forces behind changes in attitudes towards wildlife on communally owned land in Zimbabwe.

Your Excellency, I wish to assure you that under my Presidency, the successful elephant programme will continue, including the implementation of the National Elephant Action Plan. Our country is politically stable, and we had a smooth transition from the previous administration, following my inauguration and swearing in as President and Commander-in-Chief of the Zimbabwe Defence Forces on 24 November 2017. All noble conservation initiatives being championed by Zimbabwe will not be reversed but enhanced. The Minister, Permanent Secretary and Director General are confirmed to remain in place.

Going forward, I do hope to improve communications and cooperation between your great country and Zimbabwe, in general, and particularly with the U.S. Fish and Wildlife Service, with the aim of strengthening our partnership in wildlife conservation, rural development and related spheres for an improved quality of life for our people.

Please accept, Your Excellency, the assurances of my highest consideration.

Hon. E.D. Mnangagwa
President of the Republic of Zimbabwe

cc e-mail to Secretary Ryan Zinke and Greg Sheehan - USFWS

MARTIN PIETERS SAFARIS

AGREEMENT

Agreement Between Martin Pieters Safaris and

Client Name: BOB OLIVER
Client Address: (b) (6) [redacted] Terrebonne, OR 97760 USA
Location of Hunt: NGAMO/SIKUMI FOREST, ZIMBABWE
Date of Arrival: 22 EPTEMBER 2018 Travel Day to Camp
Date of Departure: 08 October 2018 Travel Day to Vic Falls
Location hunt starts: VICTORIA FALLS 23 September 2018
Location hunt ends: VICTORIA FALLS 07 October 2018
Number of hunting clients per Professional Hunter: 1
Number of non-hunting clients: N/A

Martin Pieters safaris will provide the following services & assumes responsibility for:

1. Suitable hunting concession.
2. All hunting camp accommodation, meals, soft drinks, bottled water & services of catering, laundry and camp staff for your use.
3. Provision of alcoholic beverages in moderation.
4. All hunting facilities and staff including a fully qualified PH. tracker(s) & skinner(s)
5. Fully equipped 4x4 hunting vehicle & driver.
6. Payment of conservation fees, concession fees ,all relevant hunting permits, firearm import permits on behalf of the client(s)
7. All field preparation of trophies, dip/ pack , Government trophy export, documentation and delivery of such to our local shipping agent.
8. A suitably knowledgeable person to facilitate customs procedures and firearm import on arrival & departure.
9. Booking of all charter flight services
10. Hotel reservations prior to & after hunt as required .
11. Arrangement of all airport/hotel and airstrip/camp transfers .

The Client takes full responsibility for:

1. International & domestic scheduled flight costs and reservations.
2. Hotel accommodation/transfer costs prior to & after hunt.
3. Payment of hunt cost–in full prior to departure.
4. Payment of air charter costs–in full prior to departure.
5. Payment of firearm import permit fees (if applicable)–in full prior to departure.

6. Payment of all trophy fees one very additional animal taken or wounded &lost, before departure from camp at conclusion of hunt, in US$ cash or pre arranged wire transfer.
7. Payment of all taxes for daily rates and trophy fees as per the Zimbabwe government stipulations.
8. Optional payment of staff & PH gratuities and any other personal expenses.
9. Payment for all trophy shipping & documentation from Zimbabwe and or taxidermy work, if applicable.
10. Visa fees & international airport departure fees
11. Ammunition tax imposed by Customs, as necessary

Hunt Costs:

15 DAYS @ $ 2500/ day Hunt begins 23 September through 07 October 2018

Extras

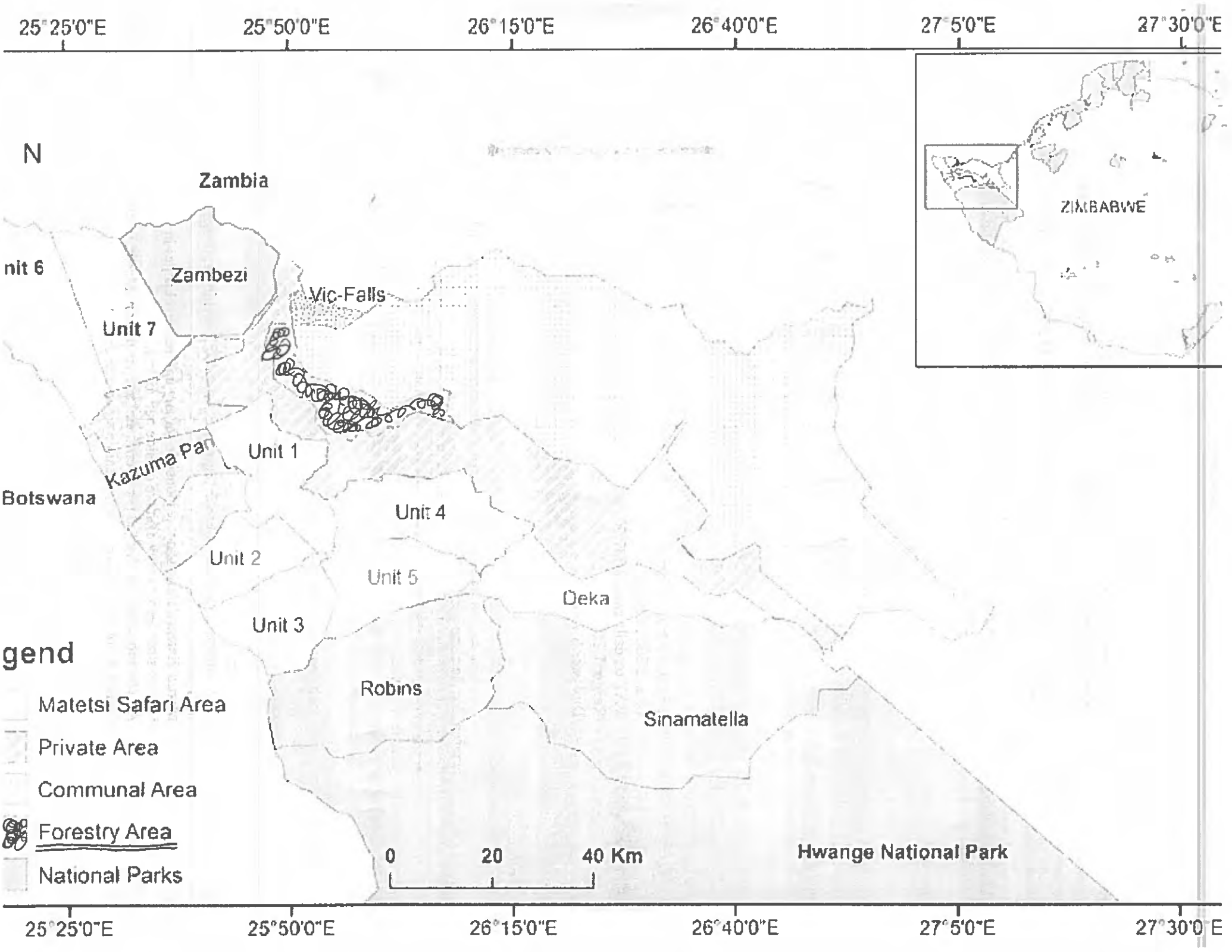
- Trophy fee elephant $ 22 500
- Plains game as per 2018 listed Ngamo rates.
- 4 % tax on trophy fees
- Cites $ 300 (elephant)
- VAT on daily rates $ 337.50
- Ranger $ 1170
- Dip/ pack $ 750

Cancellation Policy

In the event of the cancellation of the hunt by the Client, any deposit will not be refundable under any circumstances. However dates can be changed by mutual consent for the same year.
In the event of cancellation of the hunt by Martin Pieters Safaris, all efforts will be made to reschedule the hunt to the convenience of the client. Failing that, all monies will be refunded.

Please Note:

- Only mature males of the species listed above may be hunted.
- The client(s) takes full responsibility for all animals he shoots, whether killed or wounded & lost and thus is responsible for any penalty imposed by the Game Department should there be an infringement of the Game Laws, by accident or intent
- Any changes or alterations to this Agreement must be in writing and signed by both parties.
- Martin Pieters Safaris is not responsible for any unforeseen changes in Government fees/taxes, which are outside our control.
- Air charters costs are charged per aircraft and not per person. Martin Pieters Safaris is not responsible for any possible air charter delays.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Zambezi
Vic-Falls
Unit 7
Unit 1
Kazuma Pan
Botswana
Unit 4
Unit 2
Unit 5
Deka
Unit 3
gend
Matetsi Safari Area
Private Area
Communal Area
Forestry Area
National Parks
Robins
Sinamatella
0
20
40 Km
Hwange National Park

MacDonald, Tim <tim_macdonald@fws.gov>

Elephant Withdrawal Inquiry Prt # 84044C

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Thu, Oct 3, 2019 at 3:25 PM
To (b) (6)

Robert,

On 03/27/2018 an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 84044C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Thank you,

Tim Mac Donald

Government Information Specialist
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

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 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
TATARCHUK	BRUCE	JOHN	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
AUBURN	AL	36830	LEE	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. ✓ Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in **the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 02/21/2018

(Signature of applicant 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: 0 (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: 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: REPUBLIC OF SOUTH AFRICA, ALLDAYS, LIMPOPO PROVINCE GPS COORDINATES: S22 15.205; E029 06.509
   b. Date wildlife was hunted: Elephant was harvested on Sept. 11, 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 elephant tusks from one elephant

   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 Bijl Street, Graaff-Reinet, East Cape Province, Republic of South Africa, 6280

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 Karoo Taxidermy
   Name: Address: 15 Van der Bijl Street
   Address:
   City: Graaff-Reinet
   State/Province: Eastern Cape Province
   Country, Postal Code: Republic of South Africa 6280

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 i[redacted]orted.

Applicant's signatur[redacted] Date: 02/21/2018

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.

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):
mail to my home address

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 for 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):
Bruce Tatarchuk [redacted] (home), [redacted] (cell),
[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.

ORDINARY PERMIT

PERMIT NUMBER: O № 13818

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	DEDET.
ADDRESS	Room 11 NANNIKA ERASMUS
	LOUIS TRICHARDT
PROVINCE	LIMPOPO

DETAILS OF PERMIT HOLDER

NAME	BRUCE JOHN	ID NO.	
SURNAME	TATARCHUK	PASSPORT NO.	(b) (6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS		(b) (6)
ADDRESS		AUBURN
ADDRESS		
TOWN		ALABAMA
POSTAL CODE		36830
PROVINCE		USA

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MR. B.J. TATARCHUK
NAME AND SURNAME: RESPONSIBLE PERSON	MR. E. SMALL
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	MAPUNGUBWE GAME RESERVE
PHYSICAL ADDRESS OF FACILITY	ALL DAYS
DISTRICT	VHEMBE
PROVINCE	LIMPOPO
REGISTERED NAME AND NUMBER (in the case of game farm)	MAPUNGUBWE GAME RESERVE

DETAILS OF SPECIES INVOLVED

SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(if known)		(if applicable)
ELEPHANT	LOXODONTA AFRICANA	MALE	001 (ONE)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

TO HUNT ONE CITES MALE ELEPHANT ON THE PROPERTY MAPUNGUBWE GAME RESERVE - ALL DAYS - VHEMBE - LIMPOPO BY AN OVERSEAS CLIENT - MR. B.J. TATARCHUK 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. B.J. TATARCHUK
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	MR. E. SMALL.
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	MR. E. SMALL.
WEAPON AND METHOD OF HUNTING	RIFLE - HUNT ON FOOT.

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: 30/08/2017	TO:	30/09/2017
RECEIPT NUMBER	10015924 - AMOUNT = R2400-00 + 1000 LIMA		
SIGNATURE OF ISSUING OFFICER		(b) (6)	
DATE STAMP:	LOUIS TRICHARDT CENTRE 2017 -08- 30		

LOUIS TRICHARDT 0920

HUNTING SPECIAL CONDITIONS

PERMIT NO: 13818

PERMIT HOLDER: Mr.B.J Tatarchuk

1. This permit does not absolve the holder thereof in obtaining any other permit, licence, certificate or document as may be required by any other relevant legislation from any province or country.
2. This permit must be signed by the permit holder and must be in his/her possession for the duration of the hunt.
3. This permit does not allow the hunting with a bow and arrow or any other prohibited method unless specified on the permit.
4. This permit does not authorise the hunting during the night, unless specified on the permit
5. This permit does not allow the hunting of listed species which is under the influence of a tranquilising, narcotic, immobilising or similar agent,
6. If a wounded animal crosses into a neighbouring country, province or property the Department as well as the country where the animal entered into must be notified within 24 hours
7. No driving of listed species for the purpose of hunting is authorised.
8. The Department reserves the right to nominate an official to be present during any or all hunts conducted in accordance with this permit.
9. The outcome of the hunt in the case of TOPS threatened species must be reported within two working days after the listed species was hunted, the hunt terminated or in the case where the hunt was not successful. This office reserves the right to inspect the hunting sight or any relevant product of such hunt.
10. In the case where trophies will not be exported from RSA the permit holder must immediately apply for a TOPS Possession Permit in the case of TOPS species
11. Elephant tusks must be marked by an Environmental officer
12. A TOPS Ordinary permit is required to convey any part of any TOPS specie hunted to any facility within the country, except a taxidermy
13. The Department may require scientific information or material from the animal hunted.
14. The non-compliance with the permit details as well as these special conditions will result in criminal charges and may influence the granting of similar permits to the permit holder.
15. Issued in terms of the Limpopo Environmental Management Act 2003, Act no. 7 of 2003.
16. An elephant/ crocodile may not be hunted next to the water's edge of an international border
17. In the case of dangerous game the minimum calibre requirement is a 375.
18. This permit does not absolve the applicant from conforming to the norms and standards for hunting
19. No put and take system of hunting is allowed.
20. No animal may be hunted in a controlled environment.
21. The use of dogs may only be used to flush birds or track wounded animals.
22. All clients must be accompanied by a Professional Hunter.

Permit Officer

30/08/2017

Date

(b) (6)

Permit Holder

WILDLIFE TRADE REGULATION
LOUIS TRICHARDT CENTRE
2017 -08- 30
P.O. BOX 3865 LOUIS TRICHARDT 0920
TEL (015) 516 0002
LIMPOPO PROVINCE

06/09/2017

Date

Mapungubwe
Game Reserve

P.O. Box 123
Alldays
0909
Republic of South Africa
Tel: 015 575 9939
Fax: 015 575 9940

Email: vhembe@lantic.net

Herewith permission is given to : Bruce John Tatarchuk

Passport Nr: (b) (6)

From: (b) (6) Auburn Alabama 36830 USA

to hunt on the following properties namely: Parma MS40 , Modena MS13, Sommerville MS9, Onrust MS80, Kruidfontein MR1, Vergenoegd MS7, Montrow MS6, Pont Drift MS12, Bultpan MS79, Princess Royal MS10, known as Mapungubwe Game Reserve.

The hunting will take place from 4 September 2017 till 16 September 2017

Exemption Permit Nr: ZA/LP/VLT/0149; Outfitter Permit Nr: ZA/LP/HO/1927; Professional Hunter Permit Nr: ZA/LP/HO/0754

Special Permit Nr:

Animals to be hunted:

SPECIE	*SEX*	*NUMBER*
Impala	Male	Five
Waterbuck	Male	Two
Blue wildebeest	Male/Female	Three
Warthog	Male/female	Three
Crocodile	Male/Female	One
Zebra	Male /Female	Three
Eland	Male	Four
Kudu	Male	Three
Klipspringer	Male	Two
Elephant	Male	One

28 August 2017

(b) (6)

E. Small

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt: Commenced 04 / 09 / 2017 Terminated 15 / 09 / 2017

A. LP № 66198

Tick appropriate Province block where hunt took place (separate sheet for each Province):

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)
			X					

POST PERMIT TO (Mark correct block with X)

PROFESSIONAL HUNTER

Name
Business Address
ID No
PH Permit No
Date Signature

CLIENT

Name
Permanent Postal Address (6)
Code Country: U.S.A.
Passport No. (6)
Tel/Fax (6)
Date Sign (6)

HUNTING OUTFITTER

Name
Business Address Code
ID No
Tel No: Fax No:
HO Permit No
Date Signature

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date of Hunt From	Date of Hunt To	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported

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 Taxidermy
Code
Country: U.K. Trophy Export Date (Estimate):

Mapungubwe
Game Reserve

P.O. Box 123
Alldays
0909
Republic of South Africa
Tel: 015 575 9939
Fax: 015 575 9940

Email: vhembe@lantic.net

Herewith permission is given to : Bruce John Tatarchuk

Passport Nr (b) (6)

From: (b) (6) Auburn Alabama 36830 USA

to hunt on the following properties namely: Parma MS40 , Modena MS13, Sommerville MS9, Onrust MS80, Kruidfontein MR1, Vergenoegd MS7, Montrow MS6, Pont Drift MS12, Bultpan MS79, Princess Royal MS10, known as Mapungubwe Game Reserve.

The hunting will take place from 4 September 2017 till 16 September 2017

Exemption Permit Nr: ZA/LP/VLT/0149; Outfitter Permit Nr: ZA/LP/HO/1927; Professional Hunter Permit Nr: ZA/LP/HO/0754

Special Permit Nr:

Animals to be hunted:

SPECIE	*SEX*	*NUMBER*
Impala	Male	Five
Waterbuck	Male	Two
Blue wildebeest	Male/Female	Three
Warthog	Male/female	Three
Crocodile	Male/Female	One
Zebra	Male /Female	Three
Eland	Male	Four
Kudu	Male	Three
Klipspringer	Male	Two
Elephant	Male	One

28 August 2017

E. Small

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

LB

RCVD MAR 30 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
MARTIN	HENRY	BRADLEY	

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: (b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
SAN ANTONIO	TEXAS	78209	BEXAR	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 (b) (6) (or stamped signatures) Date of signature (mm/dd/yyyy) 3/24/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for 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

OMB Control No. 1018-0093
Expires 08/31/2020

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°) SO
   CHIBUWE LONGITUDE 32° 14' 55.2 (32.2487)° EAS

   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:

OMB Control No. 1018-0093
Expires 08/31/2020

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

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature (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).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD APR 30 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
ESTES	ALDREDGE		

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			MATT@GENUSLOGISTICS.C

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
MIDLAND	TX	79701		USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

4/27/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

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 BAMM
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
NUMBER56 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 BAMM
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

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: 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:

Country: U.S.A

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
	Buffalo	/
CITES I	Crocodile	
	Dik-dik	
	Eland	
CITES II*	Elephant (PROBLEM) (WITH TUSK)	
	Giraffe	
	Grey Duiker	
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
*	Please report back within 48hrs after hunt	
*	Finder generated must be paid to/store among all forms the have suffered the damages	
*	No trophies must be paid to Game Product Trust Fund.	

on the following farms / hunting concessions: Kalkfeld Area

Guided by (name of guides): O.C. Bimm

Cashier receipt No.: 2145714

Issued on: 02.08.17

Amount received: N$ 10-00

MINISTRY OF ENVIRONMENT & TOURISM
ISSUING OFFICER IN THE MINISTRY
UNDER THE AUTHORITY OF THE MINISTER
OF SECTION 78 OF THE NATURE CONSERVATION
ORDINANCE, 1975 (ORDINANCE NO. 4
OF 1975) AS AMENDED.

Official MET date stamp

2017 -08- 02

Authorizing officer after consultation with the Minister on 2/8/2017

IMPORTANT: This permit is not valid if altered in any way.

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			
3/8	ELEPHANT	T	4	5	K	5		0	♂	UMKHANDI	64		(9) (a) [redacted]	

*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.

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 I 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, ALDREDGE ESTES III (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 79701 having an office and place of business at (b) (6) MIDLAND TEXAS 79701 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 thr Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize 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 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 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 ESTES (b) (6)
has caused

(Signature) (b) (6)

(Capacity) _____ **(Date)** 1/23/18

WITNESS (b) (6)

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

OMB Control No. 1018-0093
Expires Rev 08/31/2020

Federal Fish and Wildlife Permit Application Form

RCVD MAY 31 2018

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Robinson	Mark	D	

2. (b) (6) [redacted]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, p(b) (6) [redacted] block; U.S. hunters must provide their U.S. address)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e County/Province	1.f. Country
Leesburg	VA	20176	~~USA~~ Loudoun	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of **$100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is [illegible] knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties

(b) (6) [redacted]

04/22/2018

Signature of applicant or permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;

(2) Was legally obtained by the hunter through hunting for his or her personal use;

(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and

(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:

(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;

(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and

(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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1. Name and address where you wish the permit to be mailed, if **different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   504-837-1233 cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   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 – Kamanjab

   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 of 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: (b) (6) _____ 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: (b) (6) [redacted]

Name: Mark Robinson

Date: 5/18/18

[EXTERNAL] Supplement to Permit # MA93323C, Mark Robinson, elephant Namibia

Aimee Korver <permits@conservationforce.org>

Thu 6/25/2020 3:38 PM

To: Brisendine, Amy <amy_brisendine@fws.(b) (6) John Jackson, III <jjjiii@att.net>;(b) (6)

3 attachments (6 MB)

CoverPageNamibiaNat.Elephant.pdf; MarkRobinsonhuntingpermits.pdf; OperatorreportOtjambangu.pdf;

Ms. Brisendine,

Please include the attachments provided as supplement to Mr. Robinson import permit application #MA93323C.

Inluded:

-Operator Enhancement Report for Otjambangu-Ombijokanguidi Conservancy

-Hunting permits for Mark Robinson

-Cover page for the Namibia National Elephant Plan. We have previously submitted this document to the U.S.FWS and ask that it be included for consideration on making a positive enhancement finding for this application. (Let me know if you should need the entire report submitted again).

Please let me know that you have received this e-mail and if you have any questions.

Kindest Regards,

Aimee Korver

Conservation Permitting Division
CONSERVATION FORCE
3240 S. I-10 Service Rd. W, Suite 200

Metairie, LA 70001-6911
ph: 504-837-1233
email: permits@conservationforce.org
www.conservationforce.org

Ministry of Environment and Tourism
Republic of Namibia

SPECIES MANAGEMENT PLAN

Elephants

Loxodonta africana

December 2007

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: +264-61-258-491

PERMIT No.		175266
VALID FROM:		1 - 10 - 17
VALID TO:		16 - 10 - 17
RECEIPT No.:		216548

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: Mark David Robinson

Residential Address: USA

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	
I	Crocodile	
	Dik-dik	
	Eland	
II	Elephant	1 x *
	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
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
I	Cheetah	
I	Leopard	
II	Lion	
	Other	
*	Please report back after 48 hours after the hunt.	

The following farms / hunting concessions: Omatjenne/Otjohorongwati Conservancy
Otjombanga Conservancy

Hunted by (name of guides): A. Hihuilepo (snr) B Grobler
AM Alberts

MINISTRY OF ENVIRONMENT & TOURISM
ISSUING OFFICER (NAME & SIGNATURE)
UNDER THE AUTHORITY OF THE MINISTER POWERS GIVEN IN TERMS OF SECTION 78 (1) OF THE NATURE CONSERVATION ORDINANCE, 1975 (ORDINANCE NO. 4 OF 1975) AS AMENDED

Official MET date stamp
2017 -09- 29

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)

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
07-10-13	Olifant							50	♂	Ombuja Jakgeld Kingsway Place			(6) (a)	

* *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.

This permit may only be used by the person specified on the permit may conduct the hunt.

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: Peter Thormahlen

   a. Years in business: 18

   b. Name of company conducting hunt: Thormahlen & Cochran Safaris

   2. Name of concession: **Otjambangu-Ombuijokanguidi Conservancy** **Size in km²: 150,000 ha**

   a. Land tenure: __ Government lease __ Community X_ Private ranch __ Private conservancy

   b. Length of concession agreement: 3 years Can it be renewed? _x_ Yes __ No

   c. Length of renewal, if applicable: 3 years

   d. Estimated total amount received in trophy fees last year, if applicable: $4,500

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: We donate clothes and school supplies for the local school, buy uniforms for game scouts. Also responsible for generating power and drilling and maintaining of the borehole and solar pump for water supply to the community.

      It is the second term that **Otjambangu-Ombuijokanguidi** renewed with Thormahlen & Cochran Safaris and they voluntarily chose us as the preferred outfitter.

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Nearest town is Kamanjab. Map, attachment 1, **Otjambangu-Ombuijokanguidi** is no 54 & 70 on the map, and shares the elephant quota between these two areas.

   g. If the concession borders a national park, please provide the park name: _____N/A_____

h. Description of general and distinctive habitat features and any water features: The conservancy **Otjambangu-Ombuijokanguidi** is in Kunene Region in the north west of Namibia, and nestles between Palmwag and Sesfontein. There are 1,500 people in the conservancy. The landscape is a mix of hills, plains and wooded river valleys. Wildlife includes elephant, leopard, cheetah, mountain zebra, gemsbok, springbok, ostrich, steenbok, kudu, klipspringer, black backed jackal, black faced impala, lion and caracal. There is natural water in the rainy season but also drilled waterholes – some drilled by the Government of Namibia for the livestock.

3. Are there any communities living in the concession? x Yes __ No

   a. If so, estimated number of people or villages in the concession? 1500 people

4. Are there communities bordering this concession? x__ Yes __ No

   a. If so, estimated number of people or villages around the concession? **Anabeb,** Palmwag, Sesfontein, Omantendeka and Ehirovipuka. See Conservancy map. Not densily populated. Herero and Damara tribes.

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	abundance	100-150	stable	North West Game Count Surveys
Lion	average	50	stable	North West Game count surveys
Leopard	abundance	25	upwards	North West game count Surveys
Prey species	Abundance: Springbuck zebra, giraffe, baboon, gemsbuck	7000+	upwards	North West Game Count Surveys

Wildlife monitoring in the Kunene Region of Namibia is primarily accomplished through a region-wide annual game count each June jointly conducted by MET, Conservancies and the World Wildlife Fund (WWF). The annual North-West Game Count is the largest road-based game-count in the world covering approximately 6.6 million hectares and over 7,000 km of survey routes. For the last ten years, Conservancy, MET and WWF staffs have jointly carried out these game counts in the Conservancies and Concessions of the Kunene region, as well as in Skeleton Coast National Park.

6. Total employment number: __5_____

   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		
Trackers		
Anti-poaching scouts/rangers	9	9
Other anti-poaching	Namibia Game Department - MET	20-30
Cooks/housekeepers		
Community coordinators		
Managers		
Biologists		
Others: _____		

7. Number of staff employed in the off-season: 5

   a. Please identify the number and type of staff that are engaged when the season is not open:

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Same number of staff maintained.

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	9	9	2011 to date
Managers			2011 to date
Maintenance			2011 to date
Road opening/construction			
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. **Number of anti-poaching staff:** 9 Community Game Scouts, plus due to the high number of Black Rhino in this area the Game Department -MET -has a big presence of anti-poaching members in the area of up to 30 members.

   b. **Are anti-poaching patrols conducted during the hunting season, off-season, or both?** both

   c. **Months during which anti-poaching patrols are conducted:** every month

   d. **Number of anti-poaching patrols per month:** Because there are also black rhino in the Kunene Region where **Otjambangu-Ombuijokanguidi** and its neighbor conservancies are, the Save the Rhino International (SRI) and Save the Rhino Trust Namibia (SRT) use SOS - Save Our Species support to monitor and patrol the Kunene, as well as the Ministry of Environment & Tourism (MET). Constant field presence and foot patrols are an effective means to deter poaching and SRT has been employing, training, equipping and deploying teams of local trackers (rhino scouts) in the region for nearly three decades. Project staff carried out foot, vehicle, donkey patrols - for inaccessible areas - and air surveillance.

   e. **Description of anti-poaching equipment, vehicles, etc.:** Patrol 4x4 cars and on foot, and donkey.

   f. **Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution?** Namibian Government, SRI and SRT, WWF.

   g. **Do you offer rewards to poaching informants leading to arrest?** _X_ Yes __ No

   h. **Do you offer rewards to poaching informants upon conviction?** _X_ Yes __ No

   i. **Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in?** The anti-poaching campaign is linked to the Save the Rhino campaign and the saving of elephants. It is internationally driven by the organizations mentioned. These organizations employ between 20-30 personnel who monitors the areas by foot patrols, 4x4

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

safari vehicles, and even helicopter patrols. We are unaware of the budgets spent here, but it should e a substantial amount per year with all the personnel and equipment used.

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts				
Equipment				
Vehicles				
Petrol				
Rewards paid				
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered				
Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated				
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered				
Other: _____				

The black rhino poaching is a sensitive issue and therefore no information in this regard is available to us to complete the above table. However, because of all the black rhino anti-poaching programs run in the area, poaching of antelope is zero, or so little that we don't know of any incidents.

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? x__ Yes __ No

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? __voluntary and donated by our overseas clients – mostly USA citizens who donates school stationary to schools in the area.

c. Does the company provide game meat to nearby communities? x_ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: All the game meat hunted by us and as per the allocated quotas of the Minister of Environment and Tourism, go to the local community of **Otjambangu-Ombuijokanguidi**.

Yearly the following Game is harvested:
Gemsbuck x 2 @ 100 kg per carcass @N$22 / kg = N$4,400
Hartmann Zebra x 3 @ 150 kg per carcass @N$22 / kg = N$9,900
Springbuck x 2 @ 35 kg per carcass @N$22 / kg = N$1,540
Kudu x 2 @ 120 kg carcass @N$22 / kg = N$5,280
TOTAL = N$21,120.00

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.

The elephant hunted was identified as a problem animal after dozens of incidents. The Government of Namibia issues the permit for hunting elephant after years of negotiating with the community.

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in?

There is a Government Fund that is supposed to refund the community for damages, however it is depleted. Thormahlen & Cochran Safaris paid the community compensation of $15,000 in 2018 in respect of damage caused by the elephant.

Species	Damage caused	Consolation paid 2016	Consolation paid 2017	Consolation paid 2018
Elephant			$15,000	
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____US$_____

Type of project	Spending 2016	Spending 2017	Spending 2018	Remarks
Education (e.g., classrooms, offices)	$1,750	$3,500	$4,000	20 blue bags @ $200 per bag = $4000, or N$55,000. Clients donate $200, we will up the bag to the total of $200 with the necessary school or educational supplies, identified by the local schools.0-
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries	$8,100	$8,100	$8,100	9 Game Scouts @ $75 pm x 12 months
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded	$500	$500	$500	
Construction materials donated				
Other: _____	$4,500	$4,500	$4,500	Uniforms for staff and game scouts
Other: _____				
TOTALS	$14,850	$16,600	$17,100	

11. **How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?**

Please note: we operate in South Africa and Namibia, and the figures below, is for the whole operation. In **Otjambangu-Ombuijokanguidi** we only hunt what is allocated on quota, and it is fixed by the Government. It is normally 1 leopard, 1 elephant every 3 years and 1 lion in total. The total quota at Anabeb, including the plains game, are on average 88 trophy animals.

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 4 2016: 9 2017: 5	2015: 2016: 2017:	2015: 2 2016: 9 2017: 9	2015: 126 2016: 110 2017: 141
Percentage of U.S. clients	2015: 99 2016: 98 2017: 100	2015: 2016: 2017:	2015: 100 2016: 98 2017: 99	2015: 95 2016: 96 2017: 97
Trophy fees paid by U.S. clients	2015: 220000 2016: 495000 2017: 275000	2015: 2016: 2017:	2015: 42000 2016: 225000 2017: 256000	2015: 303 715 2016: 1075 000 2017: 997 375

12. **Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:**
_95%

13. **Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.**

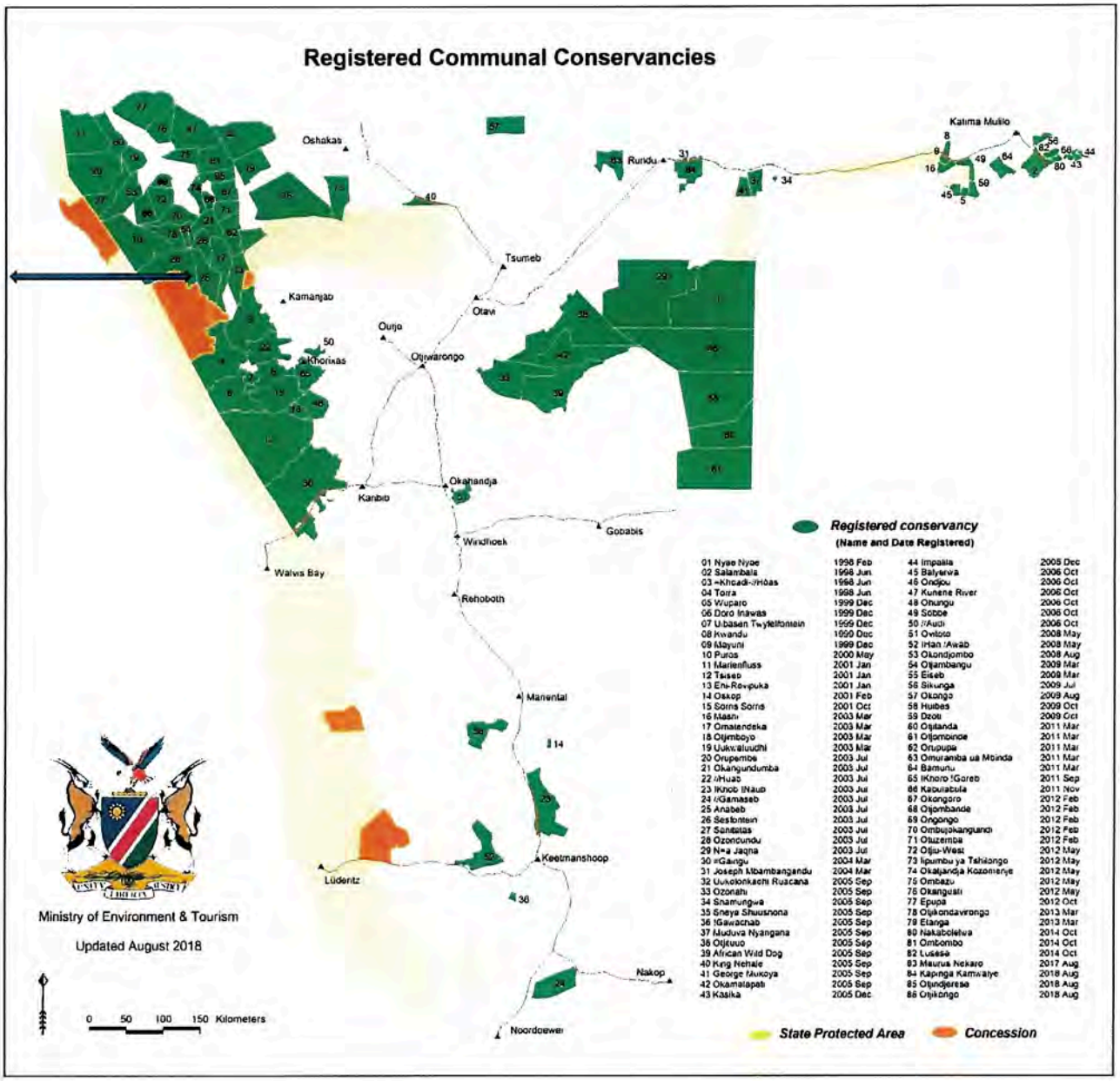
Thormahlen & Cochran operates on other conservancies in Namibia, namely:
Na#Jaqna
Ondjou
Otuzemba
Otjambangu-Ombuijokanguidi
Anabeb
Otjambangu-Ombuijokanguidi (2015-2017)
Otjambangu
Ombuijokanguidi
Okangundumba
Impalila
Kabulabula
We built camps in Na Jaqna, Ondjou, Anabeb, Impalila and Kabulabula. Thormahlen & Cochran donate all the camps to the Conservancies. We deliver all the meat that we hunt, to the conservancies, and donate to every local school the blue bags. We are building roads, and are responsible for the water and electricity supply for the camps. We employ the local community as staff and currently employ 5 to 6 conservancy members as staff . We are also responsible for the training of the staff to be able to serve the overseas clients. To date we have 32 community members employed in the various camps. We also have social responsibilities towards the conservancies: we built a school hostel, a community hall, drilling of waterholes, making cutlines, building roads etc.
Anabeb's camp was built in 2011 for N$1 million and we refurbished the camp in 2015 and 2016 -spending N$500,000. We are buying protective clothing to the game guards and uniforms for the personnel on an annual basis and opened another drilling hole for N$46000.

14. I declare that the foregoing is true and correct.

Signature:

Name: _FPJ Thormahlen Title: Mr

Attachment: 1:


Registered Communal Conservancies
Oshakati
Rundu
Katima Mulilo
Tsumeb
Otavi
Kamanjab
Outjo
Khorixas
Otjiwarongo
Okahandja
Karibib
Windhoek
Gobabis
Walvis Bay
Rehoboth
Mariental
Keetmanshoop
Lüderitz
Nakop
Noordoewer
Ministry of Environment & Tourism
Updated August 2018
0 50 100 150 Kilometers
Registered conservancy
(Name and Date Registered)
01 Nyae Nyae 1998 Feb
02 Salambala 1998 Jun
03 =Khoadi-//Hôas 1998 Jun
04 Torra 1998 Jun
05 Wuparo 1999 Dec
06 Doro !nawas 1999 Dec
07 Ui-//aesen Twyfelfontein 1999 Dec
08 Kwandu 1999 Dec
09 Mayuni 1999 Dec
10 Puros 2000 May
11 Marienfluss 2001 Jan
12 Tsisab 2001 Jan
13 Eni-Revipuka 2001 Jan
14 Otjozondjupa 2001 Feb
15 Sorris Sorris 2001 Oct
16 Masho 2003 Mar
17 Omatendeka 2003 Mar
18 Otjimboyo 2003 Mar
19 Uuku-//uudhi 2003 Mar
20 Orupembe 2003 Jul
21 Okangundumba 2003 Jul
22 //Huab 2003 Jul
23 !Khob !Naub 2003 Jul
24 //Gamaseb 2003 Jul
25 Anabeb 2003 Jul
26 Sesfontein 2003 Jul
27 Sanitatas 2003 Jul
28 Ozondundu 2003 Jul
29 N=a Jaqna 2003 Jul
30 =Gaingu 2004 Mar
31 Joseph Mbambangandu 2004 Mar
32 Uukolonkadhi Ruacana 2005 Sep
33 Ozonahi 2005 Sep
34 Sharungwa 2005 Sep
35 Eneya Shuushona 2005 Sep
36 !Gawachab 2005 Sep
37 Muduva Nyangana 2005 Sep
38 Otjituuo 2005 Sep
39 African Wild Dog 2005 Sep
40 Kwe Nehale 2005 Sep
41 George Mukoya 2005 Sep
42 Okamatapati 2005 Sep
43 Kasika 2005 Dec
44 Impalila 2005 Dec
45 Balyerwa 2006 Oct
46 Ondjou 2006 Oct
47 Kunene River 2006 Oct
48 Ohungu 2006 Oct
49 Sobbe 2006 Oct
50 //Audi 2006 Oct
51 Ovitoto 2008 May
52 Irtan !Aiab 2008 May
53 Okondjombo 2008 Aug
54 Otjambangu 2009 Mar
55 Eiseb 2009 Mar
56 Sikunga 2009 Jul
57 Okongo 2009 Aug
58 Huibes 2009 Oct
59 Dzoti 2009 Oct
60 Otjitanda 2011 Mar
61 Otjombinde 2011 Mar
62 Orupupa 2011 Mar
63 Omuramba ua Mbinda 2011 Mar
64 Bamunu 2011 Mar
65 !Khoro !Goreb 2011 Sep
66 Kapuiatsile 2011 Nov
67 Okongoro 2012 Feb
68 Otjombande 2012 Feb
69 Ongongo 2012 Feb
70 Ombujokanguindi 2012 Feb
71 Otuzemba 2012 Feb
72 Otjiu-West 2012 May
73 Ipumbu ya Tshilongo 2012 May
74 Okatjandja Kozonenye 2012 May
75 Ombazu 2012 May
76 Okanguati 2012 May
77 Epupa 2012 Oct
78 Otjikondavirongo 2013 Mar
79 Etanga 2013 Mar
80 Nakabolelwa 2014 Oct
81 Ombombo 2014 Oct
82 Lusese 2014 Oct
83 Maurus Nekaro 2017 Aug
84 Kapinga Kamwaiye 2018 Aug
85 Otjindjerese 2018 Aug
86 Otjikongo 2018 Aug
State Protected Area
Concession

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

JAN 2 8 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Kehoe	Kevin	John	
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b) (6) [redacted] ment #, Suite #, or Room #; no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Anchorage	AK	99516	Anchorage	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

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 (b) (6) [redacted] erstand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signatur [redacted] tocopied or stamped signatures) Date of signature (mm/dd/yyyy) 01/16/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanyin 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 anima and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Coppersmith Global Logistics Attn: Jennifer House 3100 S. 176th St. Ste 120 SeaTac, WA 98188

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Kevin Kehoe (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owner of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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:

N/A

b. Date wildlife is to be hunted:

N/A

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

N/A

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Namibia, Eden Game Ranch, Farm # 1264, Otjozondjupa Region, west of city of Grootfontein, GIS coordinates of kill site: S 19° 31' 564" E 18° 46' 346"

b. Date wildlife was hunted:

6 June 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Allen Cilliers Hunting Safaris

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country a the country of export/re-export and must match with the foreign export/re-export document]:

Namibia - Kings Taxidermy, 27 Banhof Strasse, Otjiwarongo, Namibia 9000

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 o your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Alan Ciliers Alan Cilliers Safaris
Address: PO Box 214
City: Grootfontein, Namibia
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Servic (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if yc 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 resident population of 38 elephants on Eden Game Ranch is stable or expanding on the 100,000+ acre ranch according to the ranch manager. See attached sheet for greater details.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

The harvest fee for the problem elephant was $12,500 which went to the Game Trust Fund. This special government fund is used to compensate ranchers for the damage to their fences and wells in addition to anti-poaching efforts and game surveys. 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 landowner that provide a conservation benefit to the species being hunted/species hunted?

Eden Game Ranch where I hunted and the outfitter's adjoining ranch (Sandveld Game Ranch) have a resident population of almost 34 Black Rhino. Funds from hunting are used to cover the anti poaching activities, water points and surveys for both elephants and rhino as well as the resident plains came on both ranches.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than tw(b) (6) endar year.

Applicant's signature: _____ Date: 1/16/2019

Be aware that there may be addit quirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Additional Information Provided for Section E. 9.

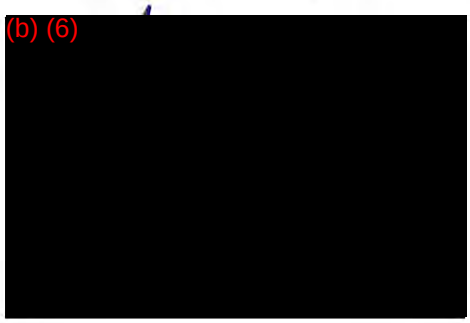
The Eden Game Ranch resident population of approximately 38 elephants is stable or expanding on the 100,000+ acre ranch according to the ranch manager. The only water available in the area for much of the year is provided by wells on the ranch. The well along with the large size of the ranch and the abundant food keeps the elephant population in the area. Elephants from the neighboring Bushmanland, like the problem elephant that I harvested, periodically knock down fences to access the wells or for breeding.

This elephant bull was hunted under a special permit as a "problem elephant." The specific elephant was the leader of a small group of elephants that had been breaking fences and damaging wells on local ranches. The specific identity was verifiable with the unique footprint, much like a fingerprint, of this particular bull. I personally saw the footprint at the site of destroyed fence on Eden and a local cattle ranch manager showed me a picture of the same footprint that he carried on his cell phone.

The harvest fee for the problem elephant was $12,500 which went to the Namibia Game Trust Fund. This special government fund is used to compensate ranchers for the damage to their fences and wells as well for anti-poaching efforts and game surveys. Government officials were notified upon harvest of the animal and arrived the next day to verify the kill and permits. They were present when the trophies were removed and the two dozen or so workers from the affected surrounding ranches harvested the meat.

Eden Game Ranch where I hunted and the outfitter's adjoining ranch (Sandveld Game Ranch) have a resident population of almost 34 Black Rhino. Funds from hunting are used to cover the anti poaching efforts, water points and surveys for elephants and rhino as well as the resident plains came on both ranches. The meat from the harvested elephant was distributed to the workers of six or so ranches (most were cattle ranches) where the elephant had damaged fences and wells. This obviously provides a greater tolerance for the elephants that roam the area.

(b) (6)



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 06158

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant: Kevin J. Kehoe

2. ~~Identity No.~~ / Passport N [redacted]

3. Residential address: [redacted] Anchorage Alasika 99516 USA Tel No.:

4. Postal address: [redacted] Anchorage Alasika, 99516 USA

[redacted]

SIGNATURE OF APPLICANT

5. From where are products obtained: Permit 179672

6. The following documents are attached as proof of ownership:

(a) Copy of passport

(b) Copy of permit No. 179672

(c)

(d)

(e)

15 AUG 2018

DATE

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.:		179672
VALID FROM:		28.05.18
VALID TO:		20.06.18
RECEIPT No.:		5753259

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: K - Kehoe

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
CITES I	Crocodile	
	Dik-dik	
	Eland	
CITES II *	Elephant (PROBLEM)	1X
	Giraffe	
	Grey Duiker	
CITES II	Hippopotamus	
	Impala. Black-faced	
	Impala. common	
	Klipspringer	
	Kudu	
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	

* Please report back within 48hours after hunt
* MET staff to accompany the hunt to identify the problem elephant
* An amount of N$20,000 to be paid to GPTF.
* Please contact nearest MET office 7days prior the hunt

on the following farms / hunting concessions: Marcelaboom Area

Guided by (name of guides): W + A. Cillers

MINISTRY OF ENVIRONMENT & TOURISM
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.

Official MET date stamp

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
2018 -05- 28
WINDHOEK PERMIT OFFICE
Private Bag 13306, Windhoek

IMPORTANT: This permit is not valid if altered in anyway

typoprint 2931/1 • Tel: 061 228777

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
6/6/18	Elephant							25½	M	Eden	1264	T HANSEN	[redacted] (g) (g)	
	Right Tusk:													
	Weight:	8 kg												
Outside curve:		117	cm											
Inside curve:		95.5	cm											
Circum at Base:		35	cm											
Circum at Center:		31	cm											
	Left Tusk													
	Weight:	8 kg												
Outside curve:		109	cm											
Inside curve:		85	cm											
Circum at Base:		35.8	cm											
Circum at center:		32.7	cm											

*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 hunding 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.

Reported to Riverside on 7/6/2018. at 14hrs

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
Right	Elephant tusk	95.5cm	117cm	35cm	31cm	58cm	8	
Left	Elephant tusk	85cm	109cm	35.8	32.7	62cm	8	
1 x	Tail							
1x	Belly skin							
2x	Skins							
2x	Feet							
2x	Ears							

prime press 052013

FNB
First National Bank
Namibia

NOTIFICATION OF PAYMENT

To Whom It May Concern:

First National Bank Namibia hereby confirms that the following payment instruction has been received

Date Actioned	: 2018/09/03
Time Actioned	: 08:18:33
Trace ID	: (b) (6)
Payer Details	
Payment From	: HUNTING SAFARIS
Cur/Amount	: (b) (6)
Payee Details	
Recipient/Account no	: (b) (6)
Name	: ODUCT TRUST F
Bank	: BANK NAMIBIA LTD
Branch Code	: (b) (6)
Reference	: PROBLEM ELEPH PERMIT

END OF NOTIFICATION

To authenticate this Payment Notification please visit the First National Bank of Namibia Limited website at fnbnamibia.com.na, select the "Verify Payment" link and follow the on-screen instructions.

Our customer (the payer) has requested First National Bank of Namibia Limited to send this notification of payment to you. Should you have any queries regarding the contents of this notice, please contact the payer. First National Bank of Namibia Limited does not guarantee or warrant the accuracy and integrity of the information and data transmitted electronically and we accept no liability whatsoever for any loss, expense, claim or damage, whether direct, indirect or consequential, arising from the transmission of the information and data.

Disclaimer:
The information contained in this email is confidential and may contain proprietary information. It is meant solely for the intended recipient. Access to this email by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted in reliance on this is prohibited and may be unlawful. No liability or responsibility is accepted if information or data is, for whatever reason corrupted or does not reach its intended recipient. No warranty is given that this email is free of viruses. The views expressed in this email are, unless otherwise stated, those of the author and not those of First National Bank of Namibia Limited or its management. First National Bank of Namibia Limited reserves the right to monitor, intercept and block emails addressed to its users or take any other action in accordance with its email use policy. First National Bank of Namibia Limited is a registered financial institution in the Republic of Namibia

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Directors: I I Zaamwani-Kamwi (Chairperson), S H Moir** (Deputy-Chairperson), O L P Capelao J G Daun, C L R Haikali, R J C Hamer*, J H Hausiku, Adv G S Hinda, J R Khethe*, E S Motala*, S J van Zyl (Chief Executive)
*South African
**South African with Namibian Permanent Residence
Company Secretary: N Ashipala

First National Bank of Namibia Limited Reg. No. 2002/0180

Form 3-200-20

OMB Control No. 1018-009
Expires 08/31/202

JAN 2 8 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Kehoe	Kevin	John	

(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Anchorage	AK	99516	Anchorage	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

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 ot (b) (6) [redacted] I certify that the information submitted in this application for a permit is complete and ac false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

01/16/2019

Signature o amped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanyin 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 anim and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Coppersmith Global Logistics Attn: Jennifer House 3100 S. 176th St. Ste 120 SeaTac, WA 98188

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Kevin Kehoe (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owner of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeite collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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:

N/A

b. Date wildlife is to be hunted:

N/A

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

N/A

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Namibia, Eden Game Ranch, Farm # 1264, Otjozondjupa Region, west of city of Grootfontein, GIS coordinates of kill site: S 19° 32' 10" E 18° 43' 06"

b. Date wildlife was hunted:

11 June 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Allen Cilliers Hunting Safaris

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country a the country of export/re-export and must match with the foreign export/re-export document]:

Namibia - Kings Taxidermy, 27 Banhof Strasse, Otjiwarongo, Namibia 9000

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 or your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: Alan Cilliers Alan Cilliers Safaris
Address: PO Box 214
City: Grootfontein, Namibia
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Servic (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if yo 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 resident population of 38 elephants on Eden Game Ranch is stable or expanding on the 100,000+ acre ranch according to the ranch manager and the outfitter. See attached sheet for greater details.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

The harvest fee for this elephant was $25,000. This included the daily rate and the trophy fee paid to the host ranch. The money was split between the owners of Eden Game Ranch and my outfitter, Alan Cilliers Safaris. See attached sheet for more details.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Eden Game Ranch where I hunted and the outfitter's adjoining ranch (Sandveld Game Ranch) have a resident population of almost 34 Black Rhino. Funds from hunting are used to cover the anti poaching activities, water points and surveys for both elephants and rhino as well as the resident plains came on both ranches.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two [redacted] ar year.

Applicant's signature: _____ Date: 1/16/2019

Be aware that there may be additio[redacted]rements by your local or state governments, as well as required by other Federal a[redacted] to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Additional Information Provided for Section E. 9.

The Eden Game Ranch resident population of approximately 38 elephants is stable or expanding on the 100,000+ acre ranch according to the ranch manager and my outfitte The only water available in the area for much of the year is provided by wells on the ranches. The well along with the large size of the ranch and the abundant food keeps the elephant population in the area. Elephants from the neighboring Bushmanland periodically knock down fences to access the wells or for breeding necessitating constant repairs.

The harvest fee for this elephant was $25,000 which was all inclusive of the daily rate and the trophy fee paid to the host ranch (Eden Game Ranch). Both the owner of Eder Game Ranch and the outfitter Alan Cilliers who owns the adjoining Sandveld Game Ranch of over 60K acres go to great efforts to combat poaching. They also operate numerous water points that require constant maintenance. They were some of the first ranch owners to allow Black Rhino onto their ranches. The population between the twc ranches numbers almost 34 head. So in addition to protecting the resident elephant herd on Eden the funds generated from this hunt also protected the black rhino herds. There is no direct compensation for maintaining the elephant or rhino herds and of course no authorization to hunt the rhino to generate funds that way.

The meat from the harvested elephant was distributed among the native ranch workers of Eden and neighboring Sandveld Game Ranch and workers from two other cattle ranches. These workers not only staff the anti-poaching teams but act as the eyes and ears of the anti poaching effort. This creates a very symbiotic relationship which benefit both the wildlife and the ranches.

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 06159

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant: Kevin J. Kehoe

2. ~~Identity No.~~ / Passport No.: [redacted]

3. Residential address: [redacted] Anchorage Alasita 99516 U.S.A Tel No.:

4. Postal address: [redacted] Anchorage Alasita 99516 USA [redacted]

SIGN[redacted]PLICANT

5. From where are products obtained: permit No-17996

6. The following documents are attached as proof of ownership:

(a) Copy of passport

(b) Copy of permit No. 17996S

(c)

(d)

(e)

16 AUG 2018

DATE

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.:		179965
VALID FROM:		01.06.18
VALID TO:		20.06.18
RECEIPT No.:		S753759

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: K. Kehoe

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
I	Crocodile	
	Dik-dik	
	Eland	
II	Elephant	1X
	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
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
I	Cheetah	
I	Leopard	
II	Lion	
	Other	
*	Please report back within 48hours after hunt	
*	Notify nearest MET office 7days prior the hunt	

on the following farms / hunting concessions: Eden #1264

Guided by (name of guides): W. Cilliers

MINISTRY OF ENVIRONMENT & TOURISM
R.Hebes R.Hebes
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.

Official MET date stamp
MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
01-06-2018
WINDHOEK
Private Bag 13306 • Windhoek
Tel: 2842111 • Fax: 258881

IMPORTANT: This permit is not valid if altered in anyway

typoprint 2931/1 • Tel: 061 228777

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
11/6/18	Elephant							20Y	M	EDEN.	1264	T. HANSEN.	[redacted] (g) (p)	
	Right Tusk													
	Weight:	15kg												
Outside curve:		160.5	cm											
Inside curve:		120.5	cm											
Circum of Base:		42.5	cm											
Circum of center:		40	cm											
	Left Tusk													
	Weight:	13kg												
Outside curve:		117.7	cm											
Inside curve:		101.2	cm											
Circum of Base:		42	cm											
Circum at center:		40.1	cm											

*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 hunding guide. Reported to Rowland 12/6/18 at 14h30

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.

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
Right	Elephant tusk	120.5cm	140.5cm	42.5cm	40 cm	68cm	15kg	
Left	Elephant tusk	101.2cm	117.7cm	42 cm	40.1cm	61cm	13kg	
4X	Feet							
2X	Gors							
1X	Skull							

Form 3-200-20

OMB Control No. 1018-009
Expires 08/31/202

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Brown	Beau	Gregory	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b)(6) [redacted]			info@safarispecialtyimporters

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Redwood Valley	CA	95470		USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Pamela Guantanamo for Beau Brown (POA) 11-1-18

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 accompanyin 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 anim 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.

Safari Specialty Importers, 758 Sheldon Road Wallkill, NY12589

See attached

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Rosella Quartarone, 845-943-5943, info@safarispecialtyimporters.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

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:

Timbavati Farm, South Africa

b. Date wildlife was hunted:

4/1/18

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Phillip duPlessis/Intrepd Safaris

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country a the country of export/re-export and must match with the export/re-export document]:

Safari Taxidermy
South Africa

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). SEE ATTACHED PH REGISTER

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 o your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	SAFARI AIR CARGO
Address:	Holding 34, 5th Ave
City:	Bredell
State/Province:	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?

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

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

    Applicant's signature: _____ Date: 11-1-18

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SAFARI SPECIALTY IMPORTERS INC
"Hunting is Our Only Business"

Robert and Rosella Quartarone
P.O. Box 153
Pine Bush, NY 12566

1.845.943.5943
www.safarispecialtyimporters.com
info@safarispecialtyimporters.com

Authorization to Export/Import

I, BEAU GREGORY BROWN (Print Name Hunter), hereinafter referred to as the "*Client*", hereby authorize *Safari Specialty Importers, Inc.* and its successors, assignees or agents (collectively "SSI") to act on my behalf for the importing and/or exporting of hunted trophies for my personal use. *This includes the authorization to obtain any necessary information, make payment on behalf of, and sign related paperwork needed for the export and import of such trophies.*

I, the *Client*, affirm that the trophies being exported/imported by SSI on my behalf, are my personal trophies which have been legally hunted by me in compliance with all national and local laws and regulations of the country of origin pursuant to the attached Addendum.

I, the *Client*, agree to indemnify, defend, and hold harmless *SSI*, from and against any and all demands, claims, and damages to persons or property, losses and liabilities, including reasonable attorney's fees, arising out of or caused by negligence or willful misconduct by me or any third party.

I, the *Client*, agree to the Payment Terms and Addendums attached hereto and made a part hereof.

This Authorization to Export/Import will remain in effect until cancelled by either party in writing.

(b) (6) [redacted]

Client Signature

5/1/18
Date

BEAU GREGORY BROWN
Print Name

(b)(6) [redacted] Redwood Valley CA 95470
Address/City/State/Zip

(b)(6) [redacted]
Phone

(b) (6) [redacted]

Permit No.

Mpumalanga
TOURISM AND PARKS AGENCY

PERMIT FOR THE HUNTING OF

(issued in terms of the Provisions of the Nature Conservation Act 10 of 1998)

MPUMALANGA TOURISM AND PARKS AGENCY
PROFESSIONAL HUNTING
Date Stamp
2018 -03- 20
PRIVATE BAG X 11338
NELSPRUIT 1200

★ ☒ SPECIALLY PROTECTED GAME
★ ☐ PROTECTED GAME
★ ☐ ORDINARY GAME DURING A PERIOD WHICH IS *NOT AN OPEN SEASON*
★ ☒ PROTECTED WILD ANIMALS
★ ☒ GAME IN A NATURE RESERVE

★ *Mark the square as indicated in the authorisation of the Chief Executive Officer*

Full name BEAU GREGORY BROWN (b)(6) [redacted]

and residential address of the holder of the permit (b)(6) [redacted] REDWOOD VALLEY CA. 95470 USA.

Name of the owner of the land to be hunted on PAUL WHITE (HOPE - PHILLIP DU PLESSIS)

PARTICULARS OF THE HUNT

Name of farm or nature reserve and district in which it is situated	Species, number and sex of game which may be hunted	Species, number and sex of game hunted and the time and date on which it was hunted
TIMBAVATI PVT	ONE (1) ECCAPANT BULL	
HOPE PVT	ONE (1) SPOTTED HYENA	
TO BE HUNTED AT [illegible]		
AND PHILLIP DU PLESSIS [illegible]		

TO BE HUNTED IN ACCORDANCE WITH THE APNR HUNTING PROTOCOL AND APPROVED QUOTA

In terms of and subject to the provisions of the Nature Conservation Act 10 of 1998, the holder of the permit is hereby authorised to hunt the species, number and sex of the game referred to in the second column of the particulars of the hunt on the farm or nature reserve referred to in the first column thereof during the period of validity of the permit, subject to the conditions of the permit.

PERIOD OF VALIDITY OF THE PERMIT

The permit shall be valid for the period 01/04/ 20 18

to 07/04/ 20 18

Number and date of the authorisation of the Chief Executive Officer

VEEARTSNYPERMIT WORD SOK BENODIG:
VIR VERVOER VAN LEWENDE WILD EN ROV
VLEIS OF PRODUKTE.
VETERINARY PERMIT IS ALSO REQUIRED:
FOR TRANSPORT OF LIVE GAME AND RAW
MEAT OR PRODUCTS.

Permit/licence Fees:

Received R 5 250.00 + R 100 ADMIN FEE Receipt No E/7.

Signature of the person authorised by the Chief Executive Officer to issue the permit.

TO BE FORWARDED TO:

WILDLIFE PROTECTION SERVICES
Private Bag X11338, Nelspruit, 1200 • Tel +27 (0)13 759 5300/1 • Fax +27 (0)13 759 5490

SEE CONDITIONS & REQUIREMENTS ON REVERSE SIDE

Printed by White River Printers 013 751 2478

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

JAN 2 8 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Hudgins	Richard	Darin	
(b) (6)	3.a. Alternate Telephone Number	4. E-mail address	
		info@safarispecialtyimporters.	

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Potomac Falls	VA	20165		USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Louise Guarantano for R. D. Hudgins (POA) 11-1-18

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.

Safari Specialty Importers, 758 Sheldon Rd Wallkill, NY 12566

See Attached

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Rosella Quartarone, 845-943-5943, Info@safarispecialtyimporters.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

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:

ANTWERPEN-MOPANI

b. Date wildlife was hunted:

6/28/18

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Crusader Safaris/Andrew Pringle

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]:

African Wildlife Artistry
Somerset East, South AFrica

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). See Attached Permit

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Spherical Freight
Address:	Johannesburgh
City:	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?

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: Rosie Quatarm for R.D. Hudson (POA) Date: 11-1-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

PROVINSIE VAN DIE OOSKAAP | **PROVINCE OF THE EASTERN**

JAGLISENSIE | HUNTING 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** 55299

Behoudens die bepalings van die Ordonnansie op Natuur 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 ..... D Hudson

Woonadres
Residential address ..... USA

.....

.....

Ontvangs van voorgeskrewe lisensiegeld word hierby erken /
Receipt of prescribed licence fee is hereby acknowledged

Datumstempel / Date stamp 28/6/18

.....
* Direkteur van Natuurbewaring / * Ontvanger van Inkomste / * Gemagtigde persoon /
* Director of Nature Conservation / * Receiver of Revenue / * Authorised person

.....
Lisensiehouer /
Licence holder

VOORWAARDES

1. Hierdie lisensie tree in werking slegs indien dit deur die houer daarvan onderteken is.
2. Hierdie lisensie is geldig vir twaalf maande.

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**

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

KZN 033882

Duration of Hunt: Commenced 28/06/2018 Terminated 12/07/2018

Tick appropriate province block where hunt took place (separate sheet for each Province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	North Province (NP)	North West (NW)	Mpumalanga (MPB)	Western Cape (CNC)	Eastern Cape (EC)	Northen Cape (NC)
			X					

Post Permit To (mark correct block with X)

PROFESSIONAL HUNTER

Name: Radcliffe Robertson
Business Address: P.O Box 710
Richmond
Code: 3780
I.D. No.: 8702135081080
PH Permit No: ZA/LP/92905
Date: 12/07/2018 Signature:

[redacted] (b) (6)

HUNTING OUTFITTER

Name: Andrew Print
Business Address: Doornkloof
Richmond Code: 3780
I.D. No.: 7802075087082
Tel No: 0466851402 Fax
H.O. Permit No: ZA/LP/82319
Date: 12/7/18 Signature:

Farm Name / Registration No:	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 ♂	Sex ♀	Part of Trophy to be Exported
Antwerpen	Mopani	J Campbell	06760	28/6	12/7	Elephant	1	✓		Tusks, Skin
	Hoedspruit	I A Strydom	22597	"	"	Giraffe	1	✓		Skin

COPIES: Client Original ..... Hand to client
Hunter 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 ..... Remain in book

Address to which trophies are to be sent:
TBA
Code:
Country: Trophy Export Date (Estimate):

Robert and Rosella Quartarone
P.O. Box 153
Pine Bush, NY 12566
1.845.941.5941
www.safarispecialtyimporters.com
info@safarispecialtyimporters.com

Authorization to Export/Import

I, RICHARD DARIN HUDGINS (Print Name Hunter), hereinafter referred to as the "*Client*", hereby authorize *Safari Specialty Importers, Inc.* and its successors, assignees or agents (collectively "SSI") to act on my behalf for the importing and/or exporting of hunted trophies for my personal use. *This includes the authorization to obtain any necessary information, make payment on behalf of, and sign related paperwork needed for the export and import of such trophies.*

I, the *Client*, affirm that the trophies being exported/imported by SSI on my behalf, are my personal trophies which have been legally hunted by me in compliance with all national and local laws and regulations of the country of origin pursuant to the attached Addendum.

I, the *Client*, agree to indemnify, defend, and hold harmless *SSI*, from and against any and all demands, claims, and damages to persons or property, losses and liabilities, including reasonable attorney's fees, arising out of or caused by negligence or willful misconduct by me or any third party.

I, the *Client*, agree to the Payment Terms and Addendums attached hereto and made a part hereof.

This Authorization to Export/Import will remain in effect until cancelled by either party in writing.

(b) (6)

Client Signature — 6-16-18 Date

RICHARD DARIN HUDGINS
Print Name

(b) (6)
Address/City/State/Zip

(b) (6)
Phone — eMail

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Van Poucke	Stephen	Mark	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			Info@safarispecialtyimporters.

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Marengo	IL	60152		USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)]
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Pamela Quartarone for Stephen Van Poucke (POA) 11-11-18

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.

Safari Specialty Importers, 758 Sheldon Rd Wallkill, NY 12566 See Attached

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Rosella Quartarone, 845-943-5943, info@safarispecialtyimporters.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

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:

NAMIBIA, Bwabwata East

b. Date wildlife was hunted:

8/13/18

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

K.STUMPFE - NDUMO SAFARIS - PO BOX 1667, KATIMA MULILO, 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]:

NDUMO SAFARIS
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:	
Business Name:	YELLOW SHARK SHIPPING
Address:	PO BOX 81413
City:	WINDHOEK, NAMIBIA
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 27 PAGES

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: Patricia Zuagain for Date: 1-1-18
Heidi M. VanPatten (POA)

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	PERMIT No.:	181839
Directorate Scientific Services Private Bag 13306 Windhoek, Namibia Enquiries: Permit Office Tel: +264-61-284 2538/2506	VALID FROM:	10.02.16
	VALID TO:	23.02.16
	RECEIPT No.:	5716067

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: S M. Van Rooke

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common	1X	Springbok		Other	
Buffalo	1X	Klipspringer		Steenbok	1X		
Crocodile		Kudu		Warthog	1X		
Dik Dik		Lechwe		Waterbuck			
Eland		Oryx (Gemsbok)		Wildebeest, Black			
Elephant	1X	Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck	1X	Zebra Burchell's			
Grey Duiker	1X	Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus	1X	Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: Bar Brittle Ecst

Guided by (name of guides): K. Stumpf & T. Beaudenhuit

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way and is not transferable.

prime press 043018

The following certificate must be completed immediately after each animal that has been hunted (please print) Permit 1813391.

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
13/08	Elephant							50	♂	Burdaraka East		K. Stuyte	[redacted] (9) (a)	
20/08	Buffalo	114		31	31	176		10	♂	Burdaraka East		K. Stuyte		

*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 the person(s) as specified on the permit may conduct the hunt

Ndumo Safaris (Pty) Ltd
P.O. Box 1667
Katima Mulilo
Namibia
Reg. no. TPH0480

Ndumo Hunting Safaris (Pty) Ltd
P.O. Box 38993
Langenhoven Park
9330
Reg. no. 660/2017FS

T: +264 81 128 5416
T: +27 76 550 6946

E: karl@huntingsafaris.net
E: admin@huntingsafaris.net
www.huntingsafaris.net

INVITATION LETTER

To whom it may concern:

This letter is to confirm that:

Surname : Van Rooke
Given names : Stephen Mark
Birth date : (b) (6)
Address : (b) (6) Murrieta IL 60152
Passport No : (b) (6)

will be hunting with us in our Bwabwata East Nth Park hunting concession in the Zambezi area of the Caprivi Region in Namibia, from 10th of August until 25th August 2018

Please assist him in obtaining the necessary visas, temporary gun permits or any other travel documents that may be needed to complete this trip.

I may be contacted on karl@huntingsafaris.net or on phone number +264811285416 should you require any additional information.

Karl Stumpfe

Owner/ Professional Hunter

TAX INVOICE

Ndumo Safaris (Pty) Ltd (Namibia)

P.O. Box 1667

Katima Mulilo

Namibia

www.huntingsafaris.net

Invoice no: 16045

DATE 2018/08/27

BILL TO **SM VAN POUCKE**

Wisconsin, USA

DESCRIPTION	QTY	UNIT PRICE	AMOUNT
14 Day trophy elephant hunt - Bwabwata National Park	1	85 000	85 000
Red Lechwe	1	5 000	5 000
Roan	1	9 500	9 500
Buffalo	1	12 500	12 500
Less payment received	1	-85 000	-85 000

SUBTOTAL $ 27 000

VAT RATE

VAT

TOTAL $ 27 000

OTHER COMMENTS

Banking Details:

For further credit Karl Stumpfe / Ndumo Safaris

Attention Brie Hanchett, Prosperity Private Banking

Victoria Main (b) (6) , Victoria Tx 77901

Office: (b) (6)

Routing numbe (b) (6)

VAT no. (b) (6)

Thank You For Your Business

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MINISTRY OF ENVIRONMENT AND TOURISM			
Directorate Scientific Services Private Bag 13306 Windhoek, Namibia Enquiries: Permit Office Tel +264-61-284 2538/2506	PERMIT No.:		181841
	VALID FROM:		16.08.18
	VALID TO:		25.08.18
	RECEIPT No.:		5761287

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: S.M. Van Pelt

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common		Springbok		Other	
Buffalo		Klipspringer		Steenbok		*Permit to be returned after hunt.	
Crocodile		Kudu		Warthog		*Ivory must be sealed with Reg. No. & Permit No. affixed by Govt. Official	
Dik-Dik		Lechwe	1x	Waterbuck			
Eland		Oryx (Gemsbok)		Wildebeest, Black			
Elephant		Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck		Zebra Burchell's			
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus	1x	Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: Kwandu Conservancy

Guided by (name of guides): K. Stimpfl & F. Bezuidenhout

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way and is not transferable.

prime press 042018

The following certificate must be completed immediately after each animal that has been hunted (please print) Permit 181041

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
14/08	Red Lechwe	63	64	19	19	165		●	♂	Kwando Conser.		J. Trant.	[redacted]	

*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 No.:		181839
Directorate Scientific Services Private Bag 13306 Windhoek, Namibia Enquiries Permit Office Tel +264-61-284 2538/2506	VALID FROM:		10.08.18
	VALID TO:		23.02.19
	RECEIPT No.:		5760067

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: S M. Van Pelt

Residential Address: U.S.A

Country:

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common	1X	Springbok		Other	
Buffalo	1X	Klipspringer		Steenbok	1X		
Crocodile		Kudu		Warthog	1X	* Advert must be in Cape Times 106, 35 & Icon of Namibia 6 & 7 not less cancelled	
Dik-Dik		Lechwe		Waterbuck			
Eland		Oryx (Gemsbok)		Wildebeest, Black			
Elephant	1X	Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck	1X	Zebra Burchell's			
Grey Duiker	1X	Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus	1X	Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: Bnr Bnrrla East

Guided by (name of guides): K. Stimpfl & F. Bezuidenhout

MINISTRY OF ENVIRONMENT & TOURISM

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way and is not transferable.

prime press 042016

The following certificate must be completed immediately after each animal that has been hunted (please print) Permit 181359.

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
13/08	Elephant							50	♂	Bwabwata East		K. Stuyte	[redacted] (6) (a)	
20/08	Buffalo	114		31	31	176		10	♂	Bwabwata East		K. Stuyte		

*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

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		182226
VALID FROM:		15.08.18
VALID TO:		25.08.18
RECEIPT No.:		5765487

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: S.M. Van Pelt

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common		Springbok		Other	
Buffalo		Klipspringer		Steenbok		A Vet must be in	
Crocodile		Kudu		Warthog		Cert with Permit 350G	
Dik-Dik		Lechwe		Waterbuck		Cert of Origin CB	
Eland	1X	Oryx (Gemsbok)		Wildebeest, Black			
Elephant		Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck		Zebra Burchell's			
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan	1X	Leopard			
Impala Black-Faced		Sable	1X	Lion			

On the following farms / hunting concessions / safari / guestfarm: Sibbe Conservancy

Guided by (name of guides): K. Stampfe & F. Bezuidenhout

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way and is not transferable.

prime press 042018

The following certificate must be completed immediately after each animal that has been hunted (please print) Permit 182226

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
17/08	Roan	62	63,5	22	22	169,5		●	♂	Sable Conservancy		K. Stuppe	(b) (6)	

*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.

When I booked the elephant hunt with Ndumo Hunting Safaris at the February 2017 SCI Convention, I knew at that time Namibia had a good reputation with USFW Services to allow the importation of an elephant trophy. The Communal Conservancy Program of the Namibian government encourages conservation through the concept of sustainable use. In remote regions where income possibilities are severely limited, but natural resources such as wildlife are abundant, this program offers jobs to local people and significant income to be used for the benefit of local communities, including a significant amount of meat delivered to the villages as trophy animals are harvested throughout the season. The safari company also harvests allotted cull animals for the communities free of charge. A significant amount of the trophy fees also goes for antipoaching support (established antipoaching camps, vehicles, personnel and equipment).

I saw two of the four antipoaching camps operating in our hunting area. We also encountered a ten man antipoaching unit fly camping in the bush in a remote area. We saw antipoaching personnel three different times in the bush, in addition to our visit to two of their established camps.

The hunting areas were "real" Africa with no fences and large areas of relatively roadless access; except by vehicle tracks in the sandy environment, passable by 4 wheel drive vehicles only. Sometimes it would be 6 or more miles between parallel tracks, so there is alot of unseen acerage out there. The people in the communal conservancies of this part of the Caprivi

strip, lived in small villages along the tar asphalt highway. You could see the homes in the villages made of wood posts harvested in the bush, and the spaces in between the posts filled in with dried mud. Actually, the villages looked very good from the road. You could see people going about their lives, ploughing with their cattle and goats. It was the dry fallow season. There were large areas cleared for gardens and field crops such as maize (corn). All the villages had kraals where they kept their livestock safe at night.

The designated areas for their cattle were over grazed and therefore more thorn brush areas were encouraged from all the trampling feet of the cattle. When you get away from the cattle and crop areas, you are into large regions of undisturbed Africa, with much elephant sign and alot of plains game (buffalo, zebra, many species of antelope). We saw lion tracks on several days in different communal areas. We saw a fresh kudu cow, one third eaten by a leopard that morning, with bite wounds in her neck. We saw multiple hyena tracks. We saw cheetah tracks on one day, and saw no sign of wild dogs but the professional hunter said he sees wild dogs once or twice a month. There were traffic signs on the tar road to warn against hitting a wild dog with your car, so I am sure they were in the region. The whole region was "real" Africa and I saw alot of animal life (hippo, crocodile, alot of red Lechwe, zebra, alot of elephant, alot of cape buffalo, blue wildebeest, tsessebe, Steenbok, duiker, reed buck, alot of impala,

alot of eland). As a hunter I saw alot of wildlife and was happy to know from tracks that there were lion, leopard, hyena, and cheetah in the ecosystem. For a photo safari, I would not have been satisfied, not even close. The wild life concentration level would not match your National Park photo opportunities like Chobe National Park in Botswana, which I visited the last 2 days of the safari. The wildlife viewing at Chobe National Park was quite good. I saw many elephant there. One afternoon there were over 500 elephants in view at one time and I went around the corner and there were another 150 elephants. There was a tremendous number of impala, a large herd of buffalo along the river, hippos, crocodiles, and a variety of antelope species. In two days I saw ten adult female lions, a number of their cubs, a full maned male lion, a leopard and 7 wild dogs. It was a wonderful experience. There were also alot of people and many safari vehicles running around the many dusty tracks along the river ecosystem. The vegetation along the river area looked dusty and under severe pressure with alot of dead trees and browse lines on the vegetation. I don't know if the animal concentrations are putting too much long term pressure on the vegetation? (that is a question wildlife biologists need to answer); but I do know that the impressive concentration of wildlife was a photographers delight. The Namibian hunting areas I was in were alot of square miles of Africa, but for the most part the animal sightings were to infrequent to make photo safari people happy. To save iconic species like elephant and lions, you need very large areas of land,

by farming and cattle/goat grazing to limit human interactions with the wildlife. Elephants and lions need large areas of land to meet all their biological needs, especially as the seasons change. Hunting fees help set aside more land for wildlife than just National Park/photo areas can accomplish on their own and can enhance corridors between population concentrations. Ideally, to set aside enough suitable land for wildlife you will get the best results by doing both photo and hunting areas.

My safari with Ndumo Hunting Safaris was in the Caprivi Strip of Namibia and cost 112,000 U.S. dollars, not including airfare and other personal expenses.

Of the $112,000:

$45,000 for elephant trophy fee
$12,500 for cape buffalo trophy fee
$ 5,000 for red Lechwe trophy fee
$ 9,500 for roan trophy fee

the trophy fees added up to $72,000 which went directly to the Namibian people. All the meat from all four animals was utilized by the people of Namibia. The safari camp crew took trucks and a large trailer and butchered the elephant in the bush. They saved all the skin. All the meat was saved including the meat on the skull, plus (liver, spleen, kidneys, diaphragm, stomach and intestines, heart, lungs, tongue, etc). They utilize all of the animal. They cook the bigger bones of all the animals in the embers of fires and then crack the bones open to get the marrow. They cut the meaty trunk of the elephant into blocks and then strips

that they hang out on liners to dry with no salt. They then take the dried trunk meat and pound it into a powder which they mix with their daily staple diet of maize meal (ground corn). Any blood and skin scraps left after the butchering job are consumed in a large bonfire in the butcher area that removes any odors, so the area will not disturb any other elephants.

Two villages split the elephant meat. The two villages were Mooiloom and Katzenze in the Barakwena Community. The Barakwena Community is a San community (original inhabitants of the area). The Barakwena Community land is along the B-1 tar road and is a part of the Bwabwata East National Park

50% of the elephant trophy fee ($22,500) went to the Game Products Trust Fund to be used for anti-poaching, establishing water points, compensation funds for human, crop, and animal loss from elephant and lion depredations, etc. The other 50% of the trophy fee ($22,500) went to the Barakwena Community to be used for the community benefit of schools and other needs.

The red lechwe came off the Mafwe Community land and the meat and the $5000 trophy fee went to the Kwando Conservancy which is part of the Mafwe Community land.

The roan came off the Mafwe Community land and the meat and the $9500 trophy fee went to the Sabbe Conservancy in the Mafwe Community land.

The buffalo came off the Barkwena Community land and the meat went to Mashambo village in the Barakwena Community. 50% of the buffalo trophy fee ($6250) went to the Game Products Trust Fund to be used for antipoaching, etc. and 50% ($6250) went to the Barkwena Community.

Unrelated to this safari, the safari company helps maintain the track roads in the hunting areas. The safari company has drilled four boreholes (350 to 400 feet deep) to get to usable non brackish water for wildlife use in particularly dry areas. The Company monitors and maintains the power sources for the wells (two solar, one windmill and one gas generator. He also gives an extra $50,000 to the communities for local projects which include schools, vehicles, solar, computers and training, and antipoaching and training.

The hunting camp I stayed in for 11 days employed 13 local community members and 4 others from just outside the community but from the same region. Four of the camp staff were women. Also the camp benefitted from $1700 in tips distributed to the camp staff. I gave it to the camp manager and she distributed it to the staff according to their custom. I also per hunting custom gave a tip to the professional hunter who is a Namibian citizen (born and raised in Namibia and he has a family in the Windhoek area of Namibia).

At the conclusion of the hunting part of the safari, I moved on to spend two relaxing days at the Sikunga Conservancy [illegible]

the entrance, I saw a community office building under construction. The outfitter owner of the Ndumo Hunting safaris was supplying all the materials and local labor to complete the building for the community at No Charge to them. He was also paying extra to reed and thatched roofing materials could be used on the building (keeping in spirit of decor for the conservation area).

In my safari area, all the houses and kraals for the animals looked in good shape and well maintained as we drove down the main tar road. The villages along the tar road had water tanks that are connected via piping from the river and pumps are used as needed to fill the above ground tanks. Therefore people have access to a reliable water source and don't have to carry it for miles. The headquarter buildings for the National Park looked clean and in good shape.

The safari company owner works with the local chiefs, community leaders and committees to try to make things go smoothly and have a working relationship for the present and the future. His lease for the hunting blocks only goes for a limited number of years and if he is not doing a good job they will not renew his lease (when the lease is up it also involves a bidding process against competitors for the hunting blocks.

The safari hunting business offers jobs to the local people. The trackers are hard working people and know their job. They are talented in the bush environment. If you stop hunting, meat will no longer be delivered to the villages on a regular basis and there will not be enough money for successful antipoaching. You do

not want these people to turn their considerable bush skills to a local bush meat trade with indiscriminate use of snares and gin traps, and for elephant ivory poaching. The safari companies presence in these hunting areas, driving the roads and constantly looking for tracks, is a definite deterrent for poachers to be using the area. The safari company can radio antipoaching personnel if they see any signs of intrusion along the border roads, inner track roads, or around waterholes. I do not believe they have had problems in their area, but obviously if they heard rifle shots or saw a large concentration of vultures, they would check it out.

We saw approximately 40-50 elephant cow/calf numbers per day of hunting and there were many tracks crossing the sandy roads. There were also bull elephant tracks from individual up to 8 in a group. The bush was thick enough in most places that within 50 to 75 yards the elephants would completely disappear in the bush. There was definitely enough elephant presence in the area based on fresh tracks crossing the road. My professional hunter believes the elephant population in the area is somewhat high and therefore long term damage to the vegetation is happening in the safari area, but it is slow and no where near the destruction caused by expanding elephant herds in Botswana.

This is a beautiful big game area with all the needed African species. There is adequate plains game to keep the predator population sustained but

also large areas for elephants to roam undisturbed as they utilize the bush for their needs as they change throughout the yearly cycle; (crossing park boundaries, photo area boundaries and international borders). This region is definitely worthy of support to help the Namibian people with their conservation objectives. To me it seemed the people lived along the tar road with their villages and livestock and garden/crop areas, and they stayed out of there vast tracks of their communal land and let the areas be true African wilderness.

You need to manage this land properly for the people and the wildlife. With mismanagement you could turn this sandy patch of Africa with many trees into a sandy semi desert which would no longer support the proper vegetation and then no longer support the biomass of animals as it presently does; not only in number of animals, but you would lose species diversity.

Personally, I think the disturbance I caused on the elephant hunt was minimal as I harvested a good old bull that was traveling by himself, so we did not disturb any other elephants. We picked up the elephant's tracks at a water hole early on the third morning of the hunt and with great tracking by the staff, we harvested the bull in early afternoon on the same day. The elephant tracks were those of an old bull, and his body and teeth showed old bull. The professional hunter said the

stool material was coarse and not chewed up well, a sign of an older animal on their last set of teeth His left tusk was 55 pounds and his right tusk was a broken off tusk, but still a respectable 44 pounds. That being said, if he dies as an old animal in the bush, he becomes a big mass of carrion and is mostly going to be consumed by hyenas, vultures and maggots.

With the hunting option, you have harvested an older male and his meat is a valuable resource for the local people and gives a return and value to their land. The local people are happy with the meat and they don't have to use as much of their land for crops and livestock. The local people's investment in wildlife land has returned a profit in meat and significant money to be used by the local community.

You don't see much wildlife near the people/crop/cattle/goat areas because there isn't as much grass, and they don't like the commotion and noise of all the cattle/herders.

The anti-poaching funds give equipment and jobs to the Namibians. They help insure the elephant, plains game, and predators in Namibia will be protected for future generations of Namibia and the world.

For one hunt, a total of $72,000 in trophy fees is a lot of money to help with these conservation projects, the people living in these areas, and the wildlife.

Certainly, hunting generated dollars are a way of giving value to these vast tracks of African wilderness which are still present. These well run projects will help to preserve the land as is, for the benefit of all the wildlife (including vegetation, birdlife, reptiles, insect diversity, etc) and get more protected land into the future. Future generations will have more to work with and can decide what needs to be done to carry it even further into the future. You need to give the land to the next generations in decent shape and not in severely depleted condition. Doing things wisely with good conservation principles, as the Namibian people seem to be doing, seems to me will be a good role model for others to follow. This gives value to the land and the wildlife, and therefore value to the Namibian people who are the owners of the land. Hopefully, the current land use can be given enough value to encourage the people to keep it as is, to protect the wildlife for future generations

Stephan Van Rooden

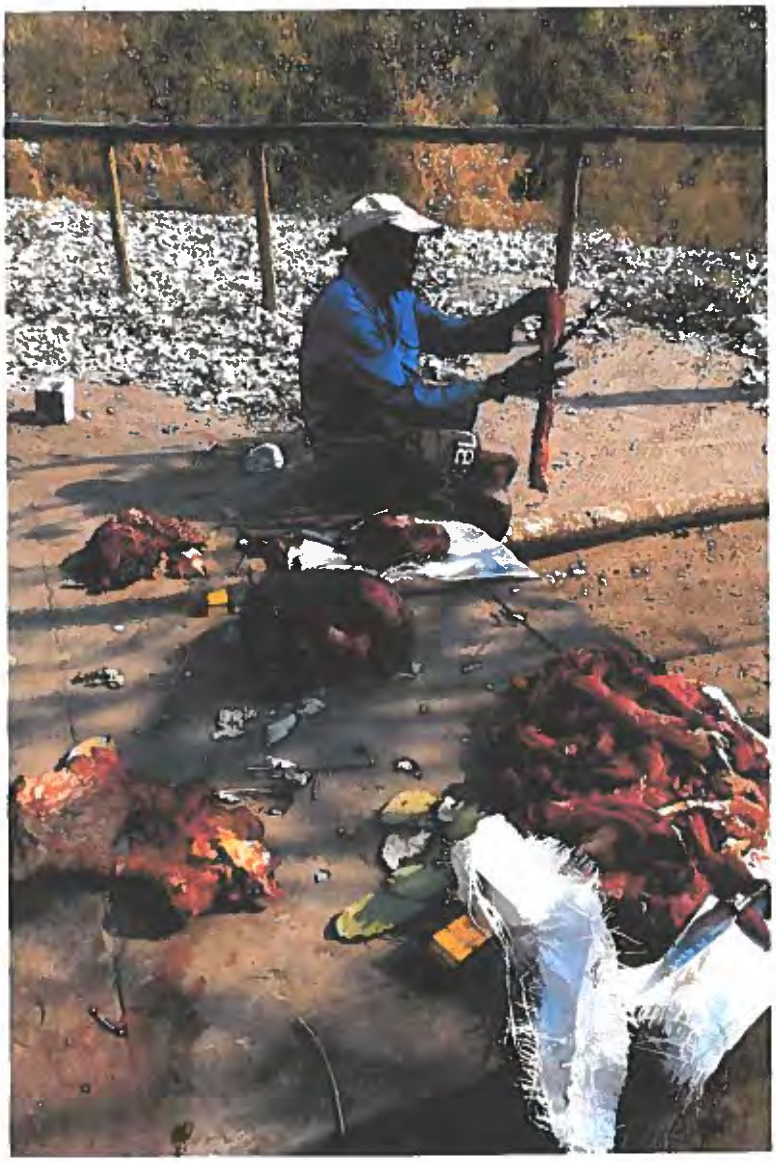
three employees at camp in their Logo Uniforms for Ndumo Hunting Safaris

Cabin at safari camp
(grass in background was recently burned.

Zebra and ~~f~~ssrebe enjoying green grass
in newly burned area

Elephant, myself, and trackers

Buffalo, myself, and safari staff



Cutting sections of elephant trunk into meat strips to be dried

Trailer loaded with part of elephant at butchers site in the bush

Salted and drying hide of the elephant

Drying meat for biltong

Roan being butchered for the Sabie Conservancy

Organs from all 4 animals were saved for the cooking pot (kidneys, liver, stomach, intestines, heart, diaphragm, etc)

Typical grass in safari area

Typical bush in safari area

Wind mill power for pump at well

Pump from well fills the water trough and then flows over to keep water in pan during dry season

Robert and Rosella Quartarone
PO Box 153
Pine Bush, NY 12566
1 845 943 5943
www.safarispecialtyimporters.com
info@safarispecialtyimporters.com

Authorization to Export/Import

I, Stephen Van Poucke (Print Name Hunter), hereinafter referred to as the "*Client*", hereby authorize *Safari Specialty Importers, Inc.* and its successors, assignees or agents (collectively "SSI") to act on my behalf for the importing and/or exporting of hunted trophies for my personal use. *This includes the authorization to obtain any necessary information, make payment on behalf of, and sign related paperwork needed for the export and import of such trophies.*

I, the *Client*, affirm that the trophies being exported/imported by SSI on my behalf, are my personal trophies which have been legally hunted by me in compliance with all national and local laws and regulations of the country of origin pursuant to the attached Addendum.

I, the *Client*, agree to indemnify, defend, and hold harmless *SSI*, from and against any and all demands, claims, and damages to persons or property, losses and liabilities, including reasonable attorney's fees, arising out of or caused by negligence or willful misconduct by me or any third party.

I, the *Client*, agree to the Payment Terms and Addendums attached hereto and made a part hereof.

This Authorization to Export/Import will remain in effect until cancelled by either party in writing.

(b) (6) [redacted]

Client Signature — 7/30/18 Date

Stephen M. Van Poucke
Print Name

(b) (6) [redacted]

Address/City/State/Zip — Morengo, IL 60152

(b) (6) [redacted]

Phone — eMail

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

JAN 2 8 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Samuelson	Douglas	Dee	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)	845-943-5943		info@safarispecialtyimporters.c

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Cheyenne	WY	82009		USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)]

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Pamela Guerlain for D. D. Samuelson (POA) 11-1-18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Safari Specialty Importers SEE ATTACHED PREPAID LABEL

See attached

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

ROSELLA QUARTARONE/Safari Specialty Importers, Inc. 845-943-5943

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

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:

Mbire (Guruve) East Area 3&4

b. Date wildlife was hunted:

April 3, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Charlton McCallum Safaris
Harare, 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]:

Afropride Freight Express
1303 Picnic Park, 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).

See Attached

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Afropride Freight Express
Address:	1303 Picnic Park, Harare 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

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: 11-1-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Robert and Rosella Quartarone
76 Boniface Dr., Suite 7
Pine Bush, NY 12566

1.845.943.5943
www.safarispecialtyimporters.com
info@safarispecialtyimporters.com

Authorization to Import

I, Doug Samuelson (Print Client Name), hereinafter referred to as the "Client", hereby authorize *Safari Specialty Importers, Inc.* and its successors, assignees or agents to act on my behalf for the importing and/or exporting of hunted trophies for my personal use. This includes the authorization to obtain any necessary information, make payment on behalf of, and sign related paperwork needed for the importation of such trophies.

I, the *Client*, agree to indemnify, defend, and hold harmless, *Safari Specialty Importers, Inc.* together with its successors, assignees or agents, from and against any and all demands, claims, and damages to persons or property, losses and liabilities, including reasonable attorney's fees, arising out of or caused by negligence or willful misconduct of any third party.

I, the *Client*, agree to the payment terms attached hereto and made a part hereof.

This authorization will remain in effect unless cancelled in writing by the undersigned.

Doug Samuelson
Client Signature

January 24, 2014
Date

Doug Samuelson
Print Name

(b) (6) , Cheyenne Wyoming 82009
Address/City/State/Zip

(b) (6)
Phone Number

Email

Zimbabwe Elephant Hunt Import Request
By Doug Samuelson

In April 2018 I headed to the Dande North Concession in Zimbabwe to hunt elephant but also learn about the anti-poaching programs in that area that I had visited 10 years previously. As we traveled through the concession we immediately were contacted by the villagers that an elephant was destroying their crops. We then went to the farms and saw most of the watermelons smashed and eaten by an elephant as well as the entire corn crop was gone. Not one ear of corn was left in the rows that I was walking through. Now I don't know if there were elephants destroying the crop earlier but at this time the culprit was a particular old bull that was easily identified by a unique track on a back foot. We had no luck at all finding the elephant but he did return every night to eat the crops and sadly I think he smashed and wasted as much as he ate. I was amazed at all the tricks the people used to fight for their crops and scare the elephant away that included fires, tall wires with plastic sacks attached, and people surrounding their fields banging on pots. The villagers were very scared and furious that they had no more crops to sell and wanted the bull killed. We would later discover non-damaging bullet holes in the face and neck of the bull elephant that our game scouts said probably were from poachers in Mozambique using AK-47s. That could have been one of the reasons he was acting so gnarly and scaring the people as he came so close to their homes each night.

On April 6 at breakfast we heard that Chief Daster Chisunga of Guruve of Mashonoland Central had been killed in a car accident and of course it was huge and sad news for the communities he served. I asked our game scouts and my PH many questions and learned some very interesting things about him that I further read about on the internet that night. Like myself Chief Chisunga was very interested in the conservation of wildlife so that it benefits the communities without them having to poach. The Chief was also chosen to represent Zimbabwe at CITES meetings in Chile and the USA. He opened the communal lands to hunting thus changing the culture from poaching to sustainable controlled hunting based on science and I think it has greatly helped the wildlife be valued by the villagers. Chief Chisunga was also supportive of the anti-poaching programs started up in the area that have been very successful. Many of the poachers that had been crossing the border from Zambia now thought is was too dangerous in Zimbabwe and began operating in Botswana because they are less likely to be caught according to the local game scouts.

The bull elephant was still raiding crops and on the 7th of April we finally found the elephant and harvested him. After listening to other hunters in years past describe what it is like to watch a village of people receive a whole elephant to share I couldn't wait to deliver the animal the next day and watch the dancing and singing while they celebrated the end of the crop raiding and the meat they would receive.

While we were going to recover the elephant a game scout approached me and asked if I would be willing to give my elephant to the community as the food for the Chiefs funeral. I don't understand the cultures in Africa as well as I would like but I did get the idea that elephant meat was almost essential for a giant celebration of their chief. Nobody could tell me how many people would be there but I got the idea it could be well over a thousand and dignitaries from all over would be at the funeral. Of course, some of the leaders of the villages that fought with the bull elephant would attend too. I had very mixed thoughts because I was so excited to watch the villagers dance but since this was the only elephant license in the area at that time I knew if they wanted legally harvested elephant it had to come from me. Also my PH assured me that he would make sure to take another elephant later in the year to that village.

The Campfire program seems very successful in Zimbabwe and the villagers benefit greatly from the share of the trophy fees and employment in the hunting camps. After weighing the options, I had to honor the request for supplying the funeral meat and I still think that was the right move. I don't know

of anyone who has ever been able to do that so I felt quite privileged. I also knew that there was going to be elephant meat at the funeral and it most likely would not be one that was from a sound biological harvest quota or an old bull that was past his prime like the crop raider was.

I had to leave before the funeral took place and I surely would have gone if my plane was a couple of days later because many people wanted to thank me for the gift and I would have liked to meet them. The elephant took on a much different meaning for me after the turn of events with this bull elephant. While the tusks are what people think of most from elephant trophies they aren't what this elephant was about. My bull was about the celebration of a life for a man that believed in giving value to wildlife and helping people have a better life.

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)

0000080090
HUNT_FUNDS_CAPTURED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Charlton McCallum Safaris	**Client's Full Name**	Douglas Dee Samuelson
ZTA (HOP) No.	HOP0259	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	Opping Investments 14 Yellowwood Lane, Kambanjie, Borrowdale Harare	**Address**	(b) (6) WY 82009 USA
Name of Professional Hunter	LEONARD TAYLOR	**Licence No.**	358
Telephone		**Fax**	0712629312
Number of Accompanying Guests		0	
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	**Address**	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	MAPLE SHIPPING AND FREIGHT	**Address**	4 BELMONT ROAD, BULAWAYO
Name of Foreign Agent		**Address**	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Mbire(Guruve) North Area 1	Mashonaland Central	
2	Dande Safari Area	Mashonaland West	
3	Mbire (Guruve) East Area 3 & Ward 11	Mashonaland Central	
4			
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15			

Date of Safari From	01-04-2018
Date of Safari To	10-04-2018
Daily Rate Charged For Big Game USD	800.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(I) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1	21-MAR-2017	DMS/8095	07-MAY-2018	USD	21,245.5	11,700.65
2	06-MAR-2017	DMS/8095	07-MAY-2018	USD	21,245.5	9,544.85
3						
4						

(II) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	8,000.00	Total Guests rate	.00
Less Commission	.00	Total Trophy fees	12,250.00
Other fees (Incidentals)	995.50	Grand Total USD	21,245.50
Percentage Commission Charged	.00	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	IMPALA	M	Killed	Mbire (Guruve) East Area 3 & Ward 11	526209	03-APR-2018	20"	250
2	ELEPHANT - WITH TUSKS	M	Killed	Dande Safari Area	189324	07-APR-2018	30lbs	12,000
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Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

JAN 2 8 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Bowen	Daniel	Webster	III
2. Date of Birth (mm/dd/yyyy) (b)(6)	3. Telephone Number (b)(6)	3.a. Alternate Telephone Number	4. E-mail address info@safarispecialtyimporters.c

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last Name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b)(6) Apartment #, Suite #, or Room #; no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Grosse Point Farms	MI	48236		USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Pamela Guarisco for David W. Bowen III (POA) 11-1-18

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.

Safari Specialty Importers, 758 Sheldon Road Wallkill, NY 12566 See Attached

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Rosella Quartarone, 845-943-5943, info@safarispecialtyimporters.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

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:

Namibia, BWABWATA West

b. Date wildlife was hunted:

11-8-17

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Jacobus H. Pienaar
Farm Hester 397, Gobabis, Nambia

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]:

Pronto Global Air
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 COPY OF HUNTING PERMIT

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	Jacobus H. Pienaar
Address:	Farm Hester 397, Gobabis,
City:	Nambia
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

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: Lorelle Juan Tan Lee David W Bowen III Date: 11-1-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Robert & Rosella Quartarone
76 Boniface Drive
Pine Bush, NY 12566
1 845 941 5943
www.safarispecialtyimporters.com
info@safarispecialtyimporters.com

Authorization to Import

I, Daniel W Powers III (Print Client Name), hereinafter referred to as the "Client", hereby authorize *Safari Specialty Importers, Inc.* and its successors, assignees or agents to act on my behalf for the importing and/or exporting of hunted trophies for my personal use. This includes the authorization to obtain any necessary information, make payment on behalf of, and sign related paperwork needed for the importation of such trophies.

I, the *Client*, agree to indemnify, defend, and hold harmless, *Safari Specialty Importers, Inc.* together with its successors, assignees or agents, from and against any and all demands, claims, and damages to persons or property, losses and liabilities, including reasonable attorney's fees, arising out of or caused by negligence or willful misconduct of any third party.

I, the *Client*, agree to the payment terms attached hereto and made a part hereof.

This authorization will remain in effect unless cancelled in writing by the Client.

(b) (6)

Client Signature

January 18, 2016
Date

Daniel W Powers III
Print Name

(b)(6)

Pine Bush, NY 12566-2459
Address/City/State/Zip

(b)(6)

(b)(6)
eMail

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.:		175688
VALID FROM:		27. 10. 2017
VALID TO:		12. 11. 2017
RECEIPT No.:		2176559

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. W. Bowen

Residential Address:

Country: USA

To hunt the specified number of game for the sake of trophies:

Indicates species listed on CITES Appendi I or II

	SPECIES: COMMON NAME	Number
	Buffalo	1X
CITES I	Crocodile	
	Dik-dik	
	Eland	
CITES II	Elephant	1X
	Giraffe	
	Grey Duiker	
CITES II	Hippopotamus	
	Impala. Black-faced	
	Impala. common	2X
	Klipspringer	
	Kudu	2X
CITES II	Lechwe	1X
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	2X
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	1X
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	2X
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
	* Report back within 48hours after hunt	

on the following farms / hunting concessions: Bra Brata West

Guided by (name of guides): J. H. Pienaar (Snr)

MINISTRY OF ENVIRONMENT & TOURISM
R. Hiebes
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

Official MET date stamp

2017 -10- 24

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
28-10-17	BUFFALO.	210		36	36	282		①	♂	BUSABWATA WEST.			(b) (6)	
1-11-17	RED LECHWE.	59	59	21	21	160		①	♂	"				
8-11-17	ELEPHANT	178		47						"				
			REPORT BACK ON 9-11-2017 TO ELOIS											

*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 hunding 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.

[EXTERNAL] Urgent - Permit 22350D Daniel Webster Bowen III Additional Documents for CITES Applicaiton

Safari Specialty Importers <info@safarispecialtyimporters.com>

Mon 3/23/2020 3:39 PM

To: Permits, FWHQ <permits@fws.gov>

1 attachments (3 MB)

doc05036320200313065030.pdf;

Howdy,

Please see attached Enhancement Questionnaire to include in the supporting documents for Daniel Webster Bowen III's Elephant CITES Permit application. Please let me know if there are any questions.

Thanks,

Wyatt Fetner

Wyatt Fetner
758 Sheldon Road
Wallkill, NY 12589
1.845.943.5943

www.safarispecialtyimporters.com
info@safarispecialtyimporters.com

OPERATOR ENHANCEMENT QUESTIONNAIRE

1. **OPERATOR INFORMATION**
   a. Name of Area Operator: HUNTAFRICA NAMIBIA
   b. Years in business: 32 years
   c. Name of Company conductinghunt: HUNTAFRICA NAMIBIA
   d. City where hunt will take place:
   e. Country where hunt will take place: NAMIBIA

2. **CONCESSION**
   a. Name of Concession: Bwabwata west National park
   b. Area in Km^2: 3800
   c. Land tenure: Government lease

Government Lease	Community	Private Ranch	Private Conservancy
x			

   d. Length of Concession Agreement: 5 years
   e. Can it be renewed? x Yes ____ No
   f. Length of Renewal, if applicable: 5 years
   g. Estimated total amount received in trophy fees last year, if applicable:
   h. Are there any special obligations under the Concession Agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain below:
   Yes, annual reporting: detailed report to the Ministry of Environment & Tourism, of each client and every animal that was hunted.
   i. Please provide the Concession location and nearest City: S 18 09°C 162 E 021 42°C 495, Rundu (bigger town) Divundu (very small town)
   j. Please attach a map or maps with the boundaries marked and showing the nearest City attached
   k. If the Concession borders a National Park, please provide Park name: Inside the Bwabwata National park
   l. Description of general and distinctive habitat features and any water features:
   Bushveld
   The Okavango river forms the western border

3. **COMMUNITIES IN THE CONCESSION**
   a. Are there any communities living in the Concession? x Yes ____ No
   b. If so, estimated number of people or villages in the Concession? 1 Village – Omega – 1000 people
   c. Are there communities bordering this Concession? x Yes ____ No
   d. If so, estimated number of people or Villages around the Concession?
   Muchiko area – 500 people

4. **RELEVANT GAME POPULATIONS IN THE CONCESSION:**[1]

[1] The new Fish and Wildlife Services (FWS) Import Permit Application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Species name	Relative Abundance			Estimated Population	3-Year trend			How is it monitored?
	Dense	Avg.	Sparse		Up	Down	Stable	
Elephant	x			2500			x	By counts
Lion			x		x			
Leopard	x						x	
Prey species								

5. Local Community Participation
   a. Total employment number: 40
   b. Please identify the number and type of all employees:

Employee 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:		

6. 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:

Employee 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		
Community Relations Personnel	1		
Others:			

7. Anti-Poaching Efforts:[2]
   a. Number of Anti-Poaching staff:
   b. Are Anti-Poaching Patrols conducted during the hunting season, off-season, or both?
      x
      Hunting season: _____ Off-season: _____ Both seasons: x

[2] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

c. Months during which Anti-Poaching Patrols are conducted: All 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 & Tourism

7. **ANTI-POACHING EFFORTS *[CONTINUATION]***

g. Do you offer rewards to poaching informants leading to arrest? x Yes ____ No

h. Do you offer rewards to poaching informants upon conviction? ____ Yes x No

i. Please describe the company's anti-poaching expenditures below:

TYPE OF EXPENSE	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
SALARIES FOR ANTI-POACHING SCOUTS	N$ 31200	N$ 31200	N$ 31200	
EQUIPMENT				
VEHICLES	4x4 vehicle	4x4 vehicle	4x4 vehicle	
PETROL	As needed	As needed	As needed	
REWARDS PAID				
OTHER: _____				Each person arrested, the informer get N$ 5000 per case
OTHER: _____				
TOTALS				

j. What currency are the expenditures given in? Namibian Dollar

8. **ANTI-POACHING RESULTS:**

CATEGORY	2016	2017	2018	REMARKS
POACHING INCIDENTS DISCOVERED				
ELEPHANT CARCASSES OBSERVED				
LION CARCASSES OBSERVED				
LEOPARD CARCASSES OBSERVED				
IVORY POACHERS ARRESTED				
MEAT POACHERS ARRESTED				
OTHER POACHERS ARRESTED				
POACHERS CONVICTED				
SNARES/GIN TRAPS COLLECTED				
FIREARMS CONFISCATED				
VEHICLES CONFISCATED				
BICYCLES CONFISCATED				

BOATS/NETS CONFISCATED				
TUSKS RECOVERED				
OTHER: _____				

9. COMMUNITY INVESTMENT:[3]
   a. Does the Company contribute money or goods/services to local communities?
      x Yes _____ No
   b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)?
      2,5 Million Namibian Dollars, required by law, required by contract & voluntary contribution
   c. Does the Company provide game meat to nearby communities? Yes x No
   d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program:
      45 tons of 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.
      N/A
   f. Please describe any consolation payments made to local residents damaged by game species
      N/A
   g. What currency are the expenditures reported in? Namibian Dollars

SPECIES	DAMAGE CAUSED	CONSOLATION PAID 2016	CONSOLATION PAID 2017	CONSOLATION PAID 2018
ELEPHANT				
LION				
LEOPARD				
OTHER				

   a. Please describe any community projects paid for by the Company:
   b. What currency are the expenditures reported in? Namibian Dollars

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
EDUCATION (E.G.: CLASSROOMS, OFFICES)	N$ 95000	N$ 110000	N$ 120 000	
EDUCATION (E.G.: SCHOOL FEES, SCHOOL SUPPLIES)				
HEALTH (E.G.: CLINICS, OFFICES)				
HEALTH (E.G.: MEDICAL SALARIES, EQUIPMENT)				

[3] The new FWS Import Permit Application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

COMMUNITY SCOUT SALARIES				
OTHER COMMUNITY ANTI-POACHING				

TYPE OF PROJECT	SPENDING 2016	SPENDING 2017	SPENDING 2018	REMARKS
LOCAL GOVERNMENT ACTIVITIES				
WATER INFRASTRUCTURE IMPROVEMENTS	1 Borehole + water installation N$ 40,000			
SPORTS TEAMS FUNDED	1 team N$ 90,000	1 team N$ 90,000	1 team N$ 90,000	
CONSTRUCTION MATERIALS DONATED	N$ 500,000	N$ 500,000	N$500,000	
OTHER: _____				
OTHER: _____				
TOTALS				

10. How many U.S. Clients did the Company have in the past three years, what percentage of the Company's clients were from the U.S., and what fees did they pay?

	HUNTING ELEPHANT	HUNTING LION	HUNTING LEOPARD	HUNTING ALL SPECIES
NUMBER OF U.S. CLIENTS	2016: 6	2016:	2017 2	201
	2017: 6	2017:	2017: 2	201
	2018: 6	2018:	2018: 0	201
PERCENTAGE OF U.S. CLIENTS	2016: 100%	2016:	2016: 100%	201
	2017: 100%	2017:	2017: 100%	201
	2018: 100%	2018:	2018:	201
TROPHY FEES PAID BY U.S. CLIENTS	2016:	2016:	2016:	201
	2017:	2017:	2017:	201
	2018:	2018:	2018:	201

11. Approximate Dollar amount and/or percentage of Company's revenue from U.S. Clients: 90%

12. **OTHER INFORMATION**: Please provide a narrative of other enhancement information about the operation, such as any special Hunting Policies (e.g., aging, size, resting areas), Concession Improvements (e.g.: digging and maintaining boreholes, restocking), Management Activities, Research, etc.

Research, Hunting policies and Concession improvements by Ministry of Environment and Tourism

Restocking through Natural breeding

13. I declare that the foregoing is true and correct:

SIGNATURE

TELEPHONE: 00264 61 305767

EMAIL: accounts@tippingpoint.com.na

JW Chapman

PRINT - FULL NAME

Mr.

TITLE

Third edition
A N G O L A
PAN WEGGOOI
PAN BESSIE
GYEUMKSARA
KUWETE
JONGORO
TCERE
PAN JAKKASS
DAM 15
TO FLOOD PLAIN
TAKAJARU
PAN ALFRED
PAN ROOIKAT
BUFFELO CAMP
DROEBOOM PAN
PAN APPELBLAAR
PAN MICHELLE
DELTA WES
DELTA PAN
PAN JOSEF
PAN STEFAN
MAHANGO GAME PARK
CAPRIVI GAME
HAMUWANGA WES
HAMUWANGA OOS
PITCIBI CROSSING
PAN KOUEWATER
GROOTWATER
VERKEERDE PAN
DAKGRAS PAN
PAN WITGAT
PAN KAMEELBOOM
PAN CHRIS
TO OMEGA I
TO DAM 15
B O T S W A N
W A N A

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

JAN 2 8 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
MAHAFFEY	WILLIAM		

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)	(b) (6)		MATT@GENUSLOGISTICS.C

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
WINTER PARK	FL	32792		US

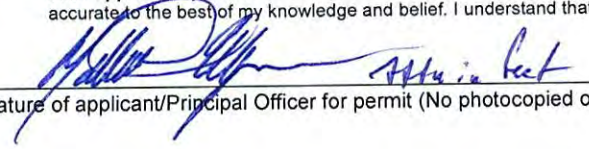
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.



12/12/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   GENUS LOGISTICS 161-15 ROCKAWAY BLVD SUITE 205 JAMAICA NY 11434

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   MATT MAYERS 718 790 0216 / MATT@GENUSLOGISTICS.COM

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owner of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeite collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Kabulabula & Lusese Conservancy

b. Date wildlife was hunted:

Sept 2nd 2016

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Phillip Steyn

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

PRONTO GLOBAL
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. If you are applying to import a 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:	Phillip Steyn
Business Name:	
Address:	Ongombo West Section 2
City:	Number 56
State/Province:	Windhoek, Namibia
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: 12/12/18

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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

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 I 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) [redacted]
Partnership 141.32. C.R.
___ Sole Proprietorship

___ Individual
___ Partnership
___ Corporation

CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, William Howard Mahaffey (Full Name of person, partnership, corporation, or sole proprietorship (identify)) a corporation doing business under the laws of the State of, Florida or a ___ doing business as ___
residing at (b)(6) [redacted] Winter Park FL 32792 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 licensed broker as required by thr Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize 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 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 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 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) William Mahaffey,
as caused these presents to be executed
(Signature) (b) (6) [redacted]
(Capacity) ___ (Date) ___
WITNESS (b) (6) [redacted]

MINISTRY OF ENVIRONMENT AND TOURISM Directorate Scientific Services Private Bag 13306	PERMIT No.:	166184

Enquiries: Chief Warden, Permit Office

Fax +264-61-258 861

VALID TO: 10.09.16

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: W.H. Mahaffey

Residential Address:

Country: USA

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
	Buffalo	
CITES I	Crocodile	
	Dik-dik	
	Eland	
CITES II	Elephant	1X
	Giraffe	
	Grey Duiker	
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell's	2X
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES II	Cheetah	
CITES II	Leopard	
CITES I	Lion	
	Other	
	*Please report back within 48hours after shooting	

on the following farms / hunting concessions: Kabulabula + Lusese Conservancy

Guided by (name of guides): P. Steyn

Cashier receipt No: MET-6766

Issued on: 30.08.16

Amount received: N$ 100-00

Authorizing officer

IMPORTANT: This permit is not valid if altered in any way.

Official MET date stamp

2016 -08- 30

prime press 072015

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
02/04/16	Elephant							40	Male	Lussese			(b) (6) [redacted]	

REPUBLIC OF NAMIBIA

MINISTRY OF WILDLIFE, CONSERVATION AND TOURISM

No.: A 08940

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant: W.H MAHAFFEY

2. Identity No. / Passport No.: .....

3. Residential address: .....

..... Tel. no.: .....

4. Postal address: U.S.A

.....

.....

SIGNATURE OF APPLICANT

5. From where are products obtained: LUSERE CONSERVANCY

6. The following documents are attached as proof of ownership:

(a) PERMIT NO 166184

(b) .....

(c) .....

(d) .....

(e) .....

MINISTRY OF ENVIRONMENT & TOURISM
Directorate of Regional Services and Park Management
2016 -12- 10
Private Bag 1020, Katima Mulilo
Tel: 066-262300 Fax: 066-253341
REPUBLIC OF NAMIBIA

10/12/16

DATE

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
A-08940	ELEPHANT	TUSK	x 0					
	" "	TRUNK	x 1					
	" "	EARS	x 2					
	" "	TAIL	x 1					
	" "	FEET	x 4					
L	E. tusk		141	35				NA 16 0054 10.70
	E. tusk		146	35				NA 16 0055 11.20

Windhoek Printers-92-12868

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Kernosky	Stephen	Keith	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Caledonia	Michigan	49316-7643	Kent	United States

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

Signature (Electronic or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   As given in Section A and C

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Stephen Keith Kernosky
   (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Loxodonta Africana 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:

Country: South Africa Region: Limpopo Province
Conservancy: Balule Nature Reserve (BNR) Nearest City: Hoedspruit

b. Date wildlife is to be hunted:

May 24 - May 31, 2019

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Andrew Pringle
Crusader Safaris

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).
hunt has not yet been conducted

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	African Wildlife Artistry
Address:	1 Industrial Rd.
City:	Somerset East
State/Province:	Eastern Cape
Country, Postal Code:	South Africa 5850

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Please see attached documents describing elephant population, status, management plan, and control.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Cost of hunt is $36,000.00 USD. Please see attached regarding specific use of funds by the reserve and its management.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Anti-poaching and environmental management. Please see attached for documented use of the funds for these purposes.
Benefits include the meat is distributed to the local population and to the Mohololo Wildlife Rehab Ctr.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than [redacted].

    Applicant's signature: [redacted] Date: DEC. 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 governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Stephen K. Kernosky, Ph. D
(b) (6) [redacted]
Caledonia, Michigan 49316-7643
(b) (6) [redacted]

December 16, 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

To whom this concerns:

Re: question 9a Form 3-200-20

In support of the request to show this legal hunt will benefit this species please refer to the enclosed document "Appendix M: Elephant Management Plan – Associated Private Nature Reserves." This plan was initiated in 2009 and is being exercised today as shown by the letter from E. T. Meong accepting the management plan.

While the management plan covers a variety of topics and details, Sections 2.6 and 3 contain material supporting this application. Key highlights are presented for each section.

From Section 2.6 Preferred management density of elephants:

- The BNR has extended the range of the African Elephant and elephants are key to the savanna ecosystem.
- Since elephants dominate the biomass, it is important to maintain a balance for the benefit of elephants as well as all the other species.
- BNR is using controlled hunting to enact this plan and it is noted that extra care has been exercised determining the need for hunting.

From Section 3 Reserve Mission and Objectives

- Using sustainable principles, the APNR is managed as a whole for a wide variety of indigenous species and their habitats.
- Elephants receive special emphasis for the monitoring/assessment activities.
- Stocking rate has increased since the 1990's and elephant populations have historically been above the guideline levels.
- Elephants contribute very highly to the stocking rate thus necessitating a management plan.
- The elephant management plan (especially for the Balule Nature Reserve) includes herd reduction (hunting).

Regards,

(b) (6) [redacted]

Stephen K. Kernosky

LIMPOPO
PROVINCIAL GOVERNMENT
REPUBLIC OF SOUTH AFRICA

Enquiries: Mr. E. T Moeng
Cell: 0824126898
Email: moenget@ledet gov.za

Dr Mike Peel
Ecological Advisor: Associated Private Nature Reserves
P.O. Box 7063
Nelspruit
1200
013 753 7147
mikep@arc.agic.za

15 December 2015

APPROVAL OF ELEPHANT MANAGEMENT PLAN –ASSOCIATED PRIVATE NATURE RESERVES

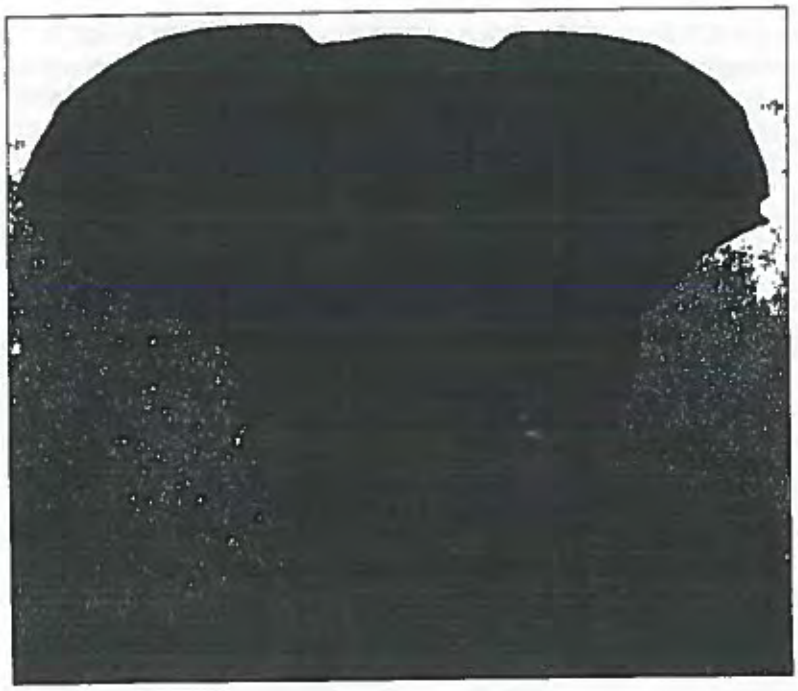
1. Your document "Elephant Management Plan – Associated Private Nature Reserves has reference.
2. Please be advised that the Member of the Executive Council Mr. S.C. Sekoati has approved the Elephant Management Plan for Associated Private Nature Reserves on the 11th of December 2015.
3. This plan is 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.

Kind regards,

E.T. Moeng: Senior Manager: Biodiversity Management

APPENDIX M: ELEPHANT MANAGEMENT PLAN - ASSOCIATED PRIVATE NATURE RESERVES

September 2009



Service providers:

Dr. Mike Peel (Agricultural Research Council, P.O. Box 7063, Nelspruit, 1200)

Dr. Marc Stalmans and Dr. Jeremy Anderson (International Conservation Services, P.O. Box 19139, Nelspruit, 1200)

Ecological surveys have been carried out as part of the Savanna Ecosystems Dynamics Project led by Dr. Mike Peel and his colleagues over the past 20 years on properties making up the APNR (for details see reference list).

1.4 Details: ARC-ICS consultants

Dr. Mike Peel (mikep@arc.agric.za); Dr. Marc Stalmans (stalmans@ics.co.za); Dr Jeremy Anderson (anderson@ics.co.za)

1.5 Neighbouring property land uses

Neighbouring private landowners generally exercise the same type of land use, namely conservation, game farming, ecotourism and hunting. Refer to section 4.4 and 4.5 of the management plan (Peel, Stalmans and Anderson, March 2009 - "Management Plan: Associated Private Nature Reserves" pp. 18-19).

In the south of the TPNR, the farm Birmingham borders the Andover Nature Reserve as its southern neighbour but separated by the Orpen tarred road. The nearest community is some 5km away and can only be accessed by crossing this tarred road.

1.6 Description of and electrification of perimeter fence

Where elephant occur naturally the fence is to be electrified on both sides. The APNR fence consists of three electrified strands set at 0.3m, 1.5m and 2m carrying a minimum voltage of 6 000 V. These strands are carried on a 2.1m high, 21 strand fence.

1.7 Potential for enlarging the property

There is potential to expand the boundaries of the APNR to the west and south of the TPNR, to the west of the KPNR and to north of the BNR. The constitution of the various reserves making up the APNR does allow for expansion subject to certain criteria being met by the applicant/s.

B. Ecological information

2.1 Climate

Refer to section 7.6.1 and 7.6.2 of the management plan (Peel, Stalmans and Anderson, March 2009 - "Management Plan: Associated Private Nature Reserves" pp. 32-33).

The general trend with elephant is an upward one and the proportion of mixed feeders in the APNR is very high. Given concerns relating to the perceived/real impact of elephant, an in-depth analysis of tree density and cover for the entire study area has been initiated. When we examine the 2007 and 2008 elephant trends we note two things:

- The overall density of elephant has increased from 0.68 elephants km^{-2} to 0.84 elephants km^{-2} in the APNR; and
- The elephant population is mobile within the APNR (and surrounding areas): KPNR (0.68 to 1.31 elephant km^{-2}), UPNR (0.27 to 0.47 elephant km^{-2}), TPNR (0.62 to 0.84 elephant km^{-2}) and BNR (1.03 to 0.38 elephant km^{-2}).

As with the tree density and canopy data, a clearer understanding of elephant impact is emerging as the monitoring programme continues

The Kruger National Park (KNP), while differing greatly in size to APNR, provides some valuable pointers to elephant management. After Whyte, Biggs, Gaylard and Braack (1999) these include:

- **A management policy where the elephant population is be managed according to measured impacts on some ecological parameter** rather than on absolute numbers of elephants;
- **Continuing with an elephant management policy until there is clear evidence that the prevailing density of elephants is having a negative impact on one or more** important **defined ecological parameters;**
- The above can be referred to as a "Threshold of Potential Concern" which is basically those upper and lower levels along a continuum of change in a selected environmental indicator which, when reached, prompts an assessment of the causes which led to such an extent of change, and results in either:
    - **Management action to moderate such cause(s);**
    - **Re-calibration of the threshold to a more realistic or meaningful level.**

TPC's should initially be established at somewhat arbitrary levels on "best-available-knowledge-and-experience". It is absolutely necessary when deciding to use such TPC's that it must be accompanied by monitoring at appropriate intervals, and that there must be considerable understanding of the factors causing change in the parameter being monitored. These need to be identified specifically for APNR. TPC's have the advantage that management has definite proactive objectives or parameters within which to manage a system, in contrast to previous practices where reactively managed events or processes to minimize or avoid crises. Nevertheless, TPC's should be challenged as to their appropriateness or validity, and adaptively modified with increasing knowledge and experience;

Any one TPC reached should act as a significant warning sign on its own, and although evaluated in overall context with the rest, must be taken seriously in its own right (APNR has shown a willingness to address the elephant population issues).

Once a Threshold/s of Potential Concern has been reached, it will necessary to implement some management action. As this issue is highly emotive, the utmost care must be taken when considering methods of reducing the population.

Refer to Chapter 6 pp. 24-26 of the management plan (Peel, Stalmans and Anderson, March 2009 - "Management Plan: Associated Private Nature Reserves").

3.1 Vision statement

For completeness the proposed Vision Statement for the APNR is presented below:

- The consolidation and enhancement of conservation interests of the APNR to gain recognition as an integral and essential part of the conservation priorities and regional interests of the Lowveld (as stated in the old master plan);
- To consolidate, expand and manage the APNR as part of a world-class Trans Frontier Conservation Area.

3.2 Mission statement

For completeness the proposed Mission Statement for the APNR is presented below:

- The APNR is committed to the conservation of biodiversity for the sake of posterity, and to manage its assets as a sustainable resource to serve the ecological, social and economic interests of the central Lowveld (old master plan);
- The APNR landscape will be developed to maintain the faunal and floral assemblages, ecological processes, cultural resources and landscape characteristics representative of the area, to foster international co-operation for the development of the Greater Limpopo Transfrontier Conservation Area (GLTFCA), and offer long-term benefit to the people of the area;
- To conserve a wide diversity of indigenous species and their associated habitats using sustainable utilisation principles (Leibnitz, Peel, de Villiers, Venter, 1993).
- The consolidation and enhancement of conservation interests of the APNR to gain recognition as an integral and essential part of the conservation priorities and regional interests of the Lowveld (as stated in the old master plan);
- To consolidate, expand and manage the APNR as part of a world-class Trans Frontier Conservation Area.

3.3 Ecological Monitoring and Research

The ecological research and monitoring programme is well developed on APNR having been initiated by the author in 1989. The programme encompasses an environmental, vegetation and animal component. Lists of reports relating to this programme are available on request. The approach to monitoring and research is as follows:

3.3.1 Monitoring

acceptable (e.g. all small trees or all large trees present and nothing in between);

- When one looks at favoured species *Sclerocarya birrea* and *Acacia nigrescens* we note increases in utilisation in particular in KPNR and to a lesser extent the TPNR and for *A. nigrescens* in the BNR. The KPNR and TPNR had the highest elephant densities and the relations between elephant density and impact on favoured trees requires investigation. The increase in impact in the BNR may indicate that even at low elephant densities *A. nigrescens* is a target species. It appears that *Combretum apiculatum* and *Colophospermum mopane* play similar roles in that relatively similar proportions of these species are selected for where they dominate. Where *Commiphora mollis* is relatively common it is a targeted species. Results for 2007 and 2008 respectively illustrate this: GORC 23% and 42%; Grietjie 9% and 27%; OWGR 16% and 15%; York 22% and 25%; and ONGRS 19% and 24%;
- *Combretum apiculatum*, *Grewia spp.* and *Colophospermum mopane* again dominated in terms of the species most targeted in the APNR. There was a notable increase in the relative proportion of *Acacia nigrescens* that were impacted on. *Colophospermum mopane* and *Grewia* spp. continue to comprise a large proportion of the impact particularly in the drier north and east while in the central, south and west the impact shifts more to *Combretum apiculatum* and *Acacia nigrescens*. The data support the observation that there is an increased impact on the 1-2m height class with the impact on *Grewia* spp.; and
- As with the tree density and canopy data, a clearer understanding of elephant impact is emerging as the monitoring programme continues.

Likely management interventions relating to elephant include (with input from J. Brits Warden Timbavati):

- Spatially and temporally altering the distribution of key resources (*e.g.* water distribution);
- Spatially and temporally altering the scale of resource availability (*e.g.* removing fences); and
- Spatially and temporarily altering the access to resources (*e.g.* excluding elephants).

When elephant numbers modulate the intensity with which elephants use a landscape, APNR will consider:

- Non-lethal induction of spatial and temporal variation in elephant numbers (*e.g.* contraception and translocation); and
- Lethal induction of spatial and temporal variation in elephant numbers (*e.g.* culling).

APNR use adaptive management approaches to evaluate and learn about the mechanisms of impact as well as whether a management action leads to change in impact and/or conflict within the context of APNR-specific objectives.

Monitoring thus focuses on aspects of elephants such as the distribution of groups, home range overlaps, demography and population estimates; modulators of elephant impact and conflict such as water distribution and fencing.

hand (e.g. wildebeest declining) and mixed feeders (elephant and impala increasing) on the other hand in the APNR. It is recommended that preliminary TPCs for herbivores on APNR are set on the basis of measurable criteria such as population size, estimated rates of increase and survival as well as an element of predator impact, calving percentage and survival and calving interval. Should a population move outside the numerical limits of the TPC, the situation must be investigated and remedial action taken where necessary.

Table 1 presents the results of the annual APNR offtake (2008) meeting to determine animal removal proposals on an annual basis. This meeting has input from representatives of the various reserves, Limpopo, Mpumalanga Tourism and Parks Authority, SANPARKS, Agricultural Research Council (the author of this document) and other specialists in the field. This shows the commitment of the APNR to responsible management.

Table 1 Proposed offtakes included in the calculation (from 2008 APNR animal offtake meeting – ticks indicate agreement):

Reserve	Species	Total	Comment
KPNR	Buffalo	10	Bulls (up to 37") for commercial/trophy hunting – C
		6	Bulls (≤ 39") for commercial/trophy hunting - C
		5	Bulls (≥ 40") for commercial/trophy hunting – C = 0.9% of the population - √
		10	Non-trophy hunting bulls (up to 37") – L*
		5	Non-trophy sub-adult bulls – L = 0.7% of the population - √
		20	Non-trophy adult cows - L
		20	Non-trophy sub-adult cows – L = 1.8% of the population - √
	Impala	2000	Non-selective by land owners – L = 21% of the population - √
UPNR	Buffalo	4	C/L? unspecified = 14.8% of the population which exceeds the guideline but given that the buffalo population within the APNR as a whole is healthy- √
	Impala	72 +10	Non-selective by land owners – L C/L? unspecified = 6% of the population - √ I think provision should be made for more removals for ecological reasons if necessary (e.g. prolonged drought). I support the removal of 10 impala for veterinary purposes
	Lion	1	No predator data available so no comment
TPNR	Buffalo	5	Bulls trophy – C = 0.19% of the population - √
		16	Bulls non-trophy – C/L?
		5	Bulls 5 'dagga boys' non-trophy – C/L?
		17	Buffalo cows – C/L? = 1.5% of the population - √
	White rhino	1	Bull for commercial/trophy hunting – C = 0.9% of the population - √
		6	To sell – C = 5.5% of the population - √
	Impala	2000	= 24.5% of the population – consider 1 700
	Hippo	2	C/L? unspecified = 3.5% of the population - √
	Lion	1	C/L? unspecified - No predator data available so no comment
	Leopard	1	C/L? unspecified - No predator data available so no comment
BNR	Buffalo	1	Bull (40") for commercial/trophy hunting – C = 0.3% of the population - √
		10	Bulls (<40") for commercial/trophy hunting – C = 2.6% of the population – consider 8 - √
		12	Landowner/management (suggest include females) =

The animals are not insured as they form part of a larger system. There is liability insurance against claims related to elephant/human conflict (input from J. Brits Warden Timbavati and J. Llewellyn Umbabat).

4.4 Contingency plans to deal with elephant problems

It is considered that no formal contingency plan is needed for the APNR as it is part of a larger system. Each of the reserves functions on a central budget with each reserve employing a management team to protect the integrity of the area. The approach to elephant management in this regard is hands off which is different to that used on smaller fenced reserves (input from J. Brits Warden Timbavati and J. Llewellyn Umbabat).

For a list of the people responsible for contingency plans within the reserves refer to section 1.2 of this plan.

4.5 Contingency plans to deal with conflict between people and elephant

Any elephant escaping from the APNR will do so along the northern, southern or western fences. The APNR reserve management teams are not the management authorities and any animal escaping from the reserve is then the responsibility of the provincial authority (LEDET or MTPA).

The boundary fence of the APNR is patrolled on a daily basis and any break in the fence is immediately reported to management. The reserve manager then contacts the relevant provincial authority which then advises reserve management as to the action they must take (in accordance with paragraph 25 of the Elephant Norms and Standards Protocols).

4.6 APNR elephant behaviour management protocol

The APNR unpublished protocol in this regard refers.

- Under extreme or life threatening circumstances all elephants shall be managed equally, whether it is a marked (collared or tagged) animal or not;
- Where an elephant's behaviour changes and it becomes a damage causing animal, steps must be taken to identify the animal with certainty and to record its movements;
- If the animal is subject to ongoing research, the researchers must be notified immediately through the Warden of the reserve;
- The Warden of the reserve must notify the reserve exco and the APNR exco;
- The responsible researchers must be proactive in their liaison with the Warden/s and indicate what practical non-lethal methods may be appropriate to resolve the problem. The reserve is under no obligation to accept the researcher's recommendations;
- Should the proposed non-lethal methods prove unsuccessful a report may be lodged with MTPA and/or LEDET;
- Land owners or reserve/lodge managers should notify the reserve Warden (committee) of any elephant that regularly causes damage to infrastructure etc. ;

Stephen K. Kernosky, Ph. D.
(b) (6)
Caledonia Michigan 49316-7643
(b) (6)

December 16, 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

In support of questions 9b and 9c, application of license and trophy fees, please consider the following which was recently supplied by the reserve Chairman:

The Balule centre gets 30% for its overall perimeter security and community activities. Balance is spent in the areas allocated to the hunt for environmental management (alien species road etc) and field rangers focused on anti poaching activities.
For example Colin and his dog Annie and mervyn this week tracked 3 would be poachers 43.5 kms over 13 hours before the 3 were arrested inside Balule. Colin and Mervyn did the internal tracking. Balule and farm watch did the tar road and fence to keep intruders inside and blocked off all their escape routes
Aided by fixed wing and helicopters once sun rise occurred.
Fantastic effort with gun recovered etc.
final arrest by Rian and mervyn with Colin in the helicopter at the very end of the track
this is a good example of centre and regional involvement

Cost of this is equivalent to income from almost one elephant hunt.

This can happen at least 5 times per year

Please also see Section 4.2 Security plan and threat analysis (including poaching) of the document submitted in support of Question 9a.

Respectfully submitted in support of my CITES application.

(b) (6)

Stephen K. Kernosky

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 6, 2019

RCVD FEB 8 2019

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Import Application of Zambia Elephant Trophy for Brett Smith

Dear Chief Cogliano:

Enclosed please find the permit application to import an elephant trophy from Zambia for Brett Smith. Please refer to the hundreds of pages of enhancement information Conservation Force previously submitted to the U.S. Fish and Wildlife Service, as well as information submitted by Zambia authorities, outfitters, and others, in making an enhancement finding for Elephant trophy imports.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Brett Smith's Elephant Permit Application, 100.00 Check and Notice of Representation

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorney and legal representative for all matters concerning my application for a permit to import a lawfully hunted 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.

In the case of a permit an ESA endangered listed species this is also a request for Ten Days Notice before the permit is issued so I and my attorney can know of approval as soon as those that may have opposed the issuance of the permit.

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signe (b) (6)

Name: Brett D. Smith

Date: 1/28/19

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD FEB 8 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity: Zambia Elephant

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Smith	Brett	D	Mr.

2. (b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

[redacted]

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
North Bend	Washington	98045	King	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
North Bend	Washington	98045	King	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.

(b) (6) [redacted]

Date of signature (mm/dd/yyyy): 01/28/2019

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

Brett Smith
(b) (6) [redacted]
North Bend, WA 98045

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Conservation Force, (504) 837-1233
cf@conservationforce.org

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☑ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   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:

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:
   Zambia - Nyampala Hunting Block
   GIS: S 1216963
   E 03173351

   b. Date wildlife was hunted:
   October 14th - 30th 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Outfitter: Baobab Safaris LTD

Professional Hunter: Adam Buskie

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Plot 133 Freedom WAY
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). 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: Baobab Safaris Limited
Business Name: Baobab Safaris Limited
Address: Plot 133 Freedom WAY
City: LUSAKA
State/Province: LUSAKA
Country, Postal Code: Zambia, 10101

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Distribution of the Trophy Fees:
45% - GOVERNMENT
45% - Community
5% - Chief of Area
5% Administrative Fee's.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more tha

Applicant's signature [redacted] Date: 1/28/19

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Serial No. 555555

NPW FORM 5B

S/No.: .....

REPUBLIC OF ZAMBIA

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 OF 2015)

0001036

THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATION, 2007

Appendix 2 Second Schedule(3)
PERMIT TO HUNT IN A GAME MANAGEMENT AREA

Station of issue..... Chilanga ..... Date of Issue..... 4th/10/ 2018 .....

DETAILS OF PERMIT HOLDER

Full name:..... Brett David Smith ..... NRC/Passport No (b) (6) .....

Tel/Mobile No.:..... E-mail address.....

Postal Address:..... Baobab Safaris ..... Residential Address: ..... USA .....

DETAILS OF FIREARMS

Firearm Licence No(s) 1.: ..... 862 ..... 2. ..... 3.....

Calibre(s) 1.: ..... 416 ..... 2. ..... 375 ..... 3.....

DETAILS OF LICENCES, HUNTING AREA & HUNTING TYPE

Resident/Non Resident Hunting Licence No (s) .....

Bird Hunting Licence No..... 000350 .....

Hunting Type..... Non Resident .....

is hereby authorised to hunt in ..... Mumyamadzi ..... Game Management Area,

..... Nyampala ..... Hunting block for ..... days from 15/10/18

to..... 30/10/18 ..... (Dates inclusive)

Amount Paid..... GRZ Receipt No..... 0043698 .....

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
Official Stamp
- 4 OCT 2018
LICENSING
PRIVATE BAG A, CHILANGA, ZAMBIA

..... Chairperson of the Committee

Note: ORIGINAL Copy to Permit Holder - Duplicate copy to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the Book

Original

NPW FORM 2

0002215
S/No.....

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue: Chilanga Date of Issue: 23/10/18

DETAILS OF LICENSEE

Full Name: Brett David Smith NRC No./Passport No.: (b) (6) [redacted]

Nationality: Age:

Tel/Mobile No: E-mail:

Full Name of Safari Company: Baobab Safaris

Certificate of Incorporation No: Date of Incorporation:

Postal Address: Box 31272 Lsk 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 US$*
Elephant	1	M	Nyamwezi	2018	

Total Animals fees paid - the kwacha equivalent of US$ 10 000
Concession Fees paid - the kwacha equivalent of US$ 3500
Grand Total the kwacha equivalent of US$ 13500

Official Stamp

MINISTRY OF TOURISM
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
23 OCT 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA

Chairperson of the Committee

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(Act No 12 of 1996)

STATUTORY INSTRUMENT No 107 OF 2010

Form ESI

The Zambia wildlife (Elephant)(Sport Hunting) Regulations,2010

SECTION A: Licensing details

Station of issue Chilanga Date of issue 23/10/18

Full Name Bret David Smid NRC/Passport No. (b) (6)

Postal Address (b) (6) North Bend, WA 98045

Residential Address (b) (6), North Bend, WA 98045

Non Resident Hunting License number 0001086

Details of firearm (S): Firearm License No(s) 862

Calibre of firearm(s) 416 Rigby

SECTION B: Hunting Details

Date of Hunt 15/10/18 Name of Hunter Bret David Smid

Hunting Block Nyampala Animal Sex Male

	Tusk 1	Tusk2
Weight	30 Kgs	33 Kgs
Length	196,3	193,4
Special Mark(s)	none	none

SECTION C: conditions

1. This form shall be completed and submitted together with the ivory to the nearest Area Management Unit within 48hrs of the killing of the elephant.
2. The completed form shall move with the ivory until the certificate of ownership is issued to the holder of the license.
3. Any lose of form ESI prior to or after the hunting shall be reported to the Authority headquarters within 48hrs.

SECTION D: Declaration

I (Licensee) Brett D. Smith hereby declare that the above information is a true record of the animal(s) hunted in the Republic of Zambia.

Date 28/10/18 Signature (b) (6)

I (ZAWA representative) Simon Mulemba hereby declare that the above information is a true record of the animal(s) hunted by the licensee.

Date 28/10/18 Signature

NPW FORM 12

ORIGINAL

S/No. 0002161

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: Adam Bucker NRC/Passport No. (b) (6)

Residential Address: Lusaka

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: Baobab

DETAILS OF CLIENT

Name of client: Bret Smith NRC/Passport No. (b) (6)

Tel/Mobile No. Nationality: USA

Postal Address: Baobab Safaris Residential Address:

Type of Licence: Non Resident Licence No. 002 1086

Date of Issue: 4/10/2018 Place of Issue: Chirundu

No. of Hunting Block where hunting was conducted: Nyamapala

Hunting period: From 15/10/18 To 30/10/18

Date Killed or wounded	Species	Sex	Number Killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
20/10/18	Buffalo	M	1		[illegible]	✓		0002135
23/10/18	Bushbuck	M	1		[illegible]	✓		0002211
25/10/18	Elephant	M	1		[illegible]	✓		0002215
26/10/18	Buffalo	M	1		[illegible]	✓		0002231
26/10/18	Bushbuck	M	1		[illegible]	✓		0002230

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
Buffalo			41"	
Bushbuck			15"	
Elephant		3 ft		
Buffalo				
Croc	13 feet			

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence [illegible] e full amount paid by the client for the hunt.

(b) (6)

Date 28/10/18 Signature of Cli[illegible]

Date 28/10/18 Signature of Professional Hunter

Date 28/10/18 Name of Wildlife Police Officer Simon Peleme

Employment No. of W.P.O.

Signature of W.P.O.

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

NPW FORM 7

Original

REPUBLIC OF ZAMBIA

0001350

S/No.: .....

THE ZAMBIA WILDLIFE ACT
(ACT NO. 14 of 2015)
THE ZAMBIA WILDLIFE
(LICENCES AND FEES) REGULATIONS, 2007
Regulation 5(2)
BIRD HUNTING LICENCE

Station of issue: Chilanga Date of issue: 04/10/2018

DETAILS OF LICENSEE

Full Name: Brett David Smith NRC/Passport No: (b) (6)

Tel/Mobile No: ..... E-mail address: .....

Postal Address: Baobab Safaris Residential Address: USA

DETAILS OF FIREARM(S)

Firearm Licence No(s) 1. 862 2. ..... 3. .....

Calibre of Firearm(s) 1. 416 2. 375 3. .....

The above named licensee is authorized to hunt birds of species specified in column 1 except during the seasons specified in column 2.

Common Name (Column 1)	Closed season (Column 2)
Fulvous Whistling Duck	1st January to 31st May
White-faced Whistling Duck	1st January to 31st May
White-Backed Duck	1st January to 31st May
Egyptian Goose	1st January to 31st October
Spur-Winged Goose	1st January to 31st May
Knob Billed Duck	1st January to 31st May
African Pygmy Goose	1st January to 31st May
African Black Duck	1st January to 31st May
Yellow-Billed Duck	1st January to 31st May
Cape Teal	1st January to 31st May
Pintail	1st January to 31st May
Red-Billed Teal	1st January to 31st May
Hottentot Teal	1st January to 31st May
Garganey	1st January to 31st May
Northern Shoveler	1st January to 31st May
Cape Shoveler	1st January to 31st May
Southern Pochard	1st January to 31st May
Coqui Francolin	1st February to 30th June
White throated Francolin	1st February to 30th June
Crested Francolin	1st February to 30th June
Shelley's Francolin	1st February to 30th June
Red-winged Francolin	1st February to 30th June
Red-billed Francolin	1st February to 30th June
Natal Francolin	1st February to 30th June
Hildebrandits Francolin	1st February to 30th June
Swaisons' Francolin	1st February to 30th June
Red-necked Francolin	1st February to 30th June
Common quail	1st October to 31st March
Harlequin Quail	1st October to 31st March
Blue Quail	1st October to 31st March
Crested Guinea fowl	1st December to 3tht April
Helmeted Guinea fowl	1st December to 3tht April

Note: A maximum of [illegible] birds shall be hunted within 21 days under Non-Resident Hunting.

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
- 4 OCT 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

Bird Hunting Licence Fees: .....

Application Fees Paid: —

Total Fees Paid: .....

GRZ Receipt No. 0042698

Chairperson of the Committee

Note: Original copy to Applicant - Duplicate to Accounts - Triplicate to Commercial - Quadruplicate to be retained in the book

The Professional Hunter
Nyampala Safaris Ltd
PIB - Nabwalya
Mpika

Dear Sir

Ref: Requesting for elephant Meat Share to be allocated for our In patients.

Refer to the above Captioned Matter.

On behalf of the entire Management and indeed the Community of Kalimba, I am here by requesting you Sir to allocate a certain piece of meat for our Patien On your way coming, you can leave th piece at the facility.

Thankyou in advance

faithfully.

RCVD FEB 8 2019

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
HURST	WAYNE	ALAN	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			cindi.rulon@procargousa.com

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
GEORGETOWN	TEXAS	78628	WILLIAMSON	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

[signature] atty in fact 02/01/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   PRO CARGO USA 15619 MORALES ROAD HOUSTON, TEXAS 77032 SELF ADDRESSED ENVELOPE ENCLOSED

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   CINDI RULON CINDI.RULON@PROCAROGUSA.COM 281-220-3176

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

LOXODANTA AFRICANA AFRICAN ELEPHANT SKIN, FEET, EARS AND TRUNK
LOXODONTA AFRICANA AFRICAN ELEPHANT SKULL, 4 SKIN PANELS 2 TUSKS, 4 FEET, 2 EARS, TAIL AND

b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

b. Date wildlife is to be hunted:

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

TIMBAVATI PRIVATE NATURE RESERVE 24.190TO 24.198S AND BETWEEN 31.227 AND 31.278 EAST. MPUMALANGA DISTRICT NEAR HOEDSPRIT

b. Date wildlife was hunted:

October 8, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Professional hunter HP DU PLESIS
Safari Company INTREPID SAFARIS

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

SAFARI TAXIDERMY
47 GOUD STREET
LABORIA. POLOKWANE 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).

ATTACHED

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name: SAFARI TAXIDERMY
Address: 47 GOUD STREET
City: LABORIA, POLOKWANE RSA
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

ATTACHED IS THE AREAL ANNUAL CENSUS REPORT FOR 2018 SHOWING A SUBSTANTIAL INCREASE IN ELEPHANT POPULATION

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

MY HUNTING FEE WAS 55,000 US DOLLARS A PORTION OF THESE FUNDS ARE USED TO FUND THE ANTI- POACHING EFFORTS OF THE PRESERVE. 70% OF THE TIMBAVATI PRIVATE NATURE RESERVE IS FUNDED BY MONIES COLLECTED FROMT THE HUNTING COMMUNITY.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

. ALL MEAT FROM THE HUNT IS DONATED TO THE MOHOLOHOLO REHABILITATION CENTER IN SOUTH AFRICA. INFORMATIONAL LETTER ATTACHED. IN ADDITION, PROCEEDS FROM THE HUNT PROVIDE EMPLOYMENT FOR GUIDES, SKINNERS, TRACKERS AND WORKERS AT THE CAMP

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or ~~taxidermist~~ applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ atty in fact Date: 02/01/2019

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Permit No.:

Mpumalanga
TOURISM AND PARKS AGENCY

PERMIT FOR THE HUNTING OF

(Issued in terms of the Provisions of the Nature Conservation Act 10 of 1998)

Date Stamp
PROFESSIONAL HUNTING
2018 -05- 08
PRIVATE BAG X 11338
NELSPRUIT 1200

- ★[X] SPECIALLY PROTECTED GAME
- ★[ ] PROTECTED GAME
- ★[ ] ORDINARY GAME DURING A PERIOD WHICH IS NOT AN OPEN SEASON
- ★[X] PROTECTED WILD ANIMALS
- ★[X] GAME IN NATURE RESERVE

★ *Mark the square as indicated in the authorisation of the Chief Executive Officer.*

Full Name WAYNE ALAN HIGGS (b) (6)

and residential address of the holder of the permit (b) (6) AUSTIN TX 78717

Name of the owner of the land to be hunted on PAUL WILLIAMS
(HOPE - PHILLIP DU PLESSIS)

PARTICULARS OF THE HUNT

Name of farm or nature reserve and district in which it is situated	Species, number and sex of game which may be hunted	Species, number and sex of game hunted and the time and date on which it was hunted
TIMBAVATI Pvt	ONE (1) ELEPHANT BULL	
LIONSPRUIT	ONE (1) BUFFALO BULL	

TO BE HUNTED IN ACCORDANCE WITH THE APNR HUNTING PROTOCOL AND APPROVED QUOTA

in the terms of and subject to the provisions of the Nature Conservation Act 10 of 1998, the holder of the permit is hereby authorised to hunt the species, number and sex of the game referred to in the second column of the particulars of the hunt on the farm or nature reserve referred to in the first column thereof during the period of validity of the permit, subject to the conditions of the permit.

PERIOD OF VALIDITY OF THE PERMIT

The permit shall be valid for the period 10/08/2018

to 18/08/2018

Number and date of the authorisation of the Chief Executive Officer

Permit / Licence Fees:

Received R 6000.00 + R100 ADMIN FEE Receipt No. E/7

Signature of the person authorised by the Chief Executive Officer to issue the Permit

VEEARTSNYPERMIT WORD OOK BENODIG:
VIR VERVOER VAN LEWENDE WILD EN ROU VLEIS OF PRODUKTE.
VETERINARY PERMIT IS ALSO REQUIRED:
FOR TRANSPORT OF LIVE GAME AND RAW MEAT OR PRODUCTS.

TO BE FORWARDED TO:
WILDLIFE PROTECTION SERVICES
Private Bag X11338, Nelspruit, 1200 •Tel +27 (0) 13 759 8300/1 • Fax +27 (0) 13 759 5490
SEE CONDITIONS & REQUIREMENTS ON REVERSE SIDE

MegaPrint0137551850"REF: MPC 0031

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 68581

Professional Hunters Association of South Africa

Duration of Hunt: Commenced 10 / 08 / 2018 Terminated 14 / 08 / 201

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
					X			

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: HP du Plessis
Business Address: PoBox 507
Alldays
Code: 0909
ID No: 760424 5095 080
PH Permit No: MTPA/PH/1929
Date: 14/8/2018 Signature:

CLIENT

Name: Wayne [redacted] Hurst
Permanent Postal Address [redacted]
Austin, Texas Code: 78717
Country: USA Tel/Fax:
Passport No: [redacted]
Email:
Date: 14/8/2018 Signature: [redacted]

HUNTING OUTFITTER

Name: HP du Plessis Intrepid Safaris
Business Address: PoBox 507
Alldays Code: 0909
I.D. No: 760424 5095 080
Tel No: 083 633 5197 Fax No:
HO Permit No: MTPA/HO/0871
Date: 14/8/2018 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
Timbavati Private Nature Reserve	Enkangeni	PR White Timbavati Private Nature Reserve	15204	10/8/18	Elephant	1		X	
				10/8/18	Buffalo.	1		X	
				14/8/18					

Address to which trophies are to be sent:
Code: Country: Trophy Export Date (Estimate):

Conservation Levy
Total:

Copies: Client Original White
1st Copy Pink Forward to Nature Conservation Authority where hunt took place
Hunting Outfitter 2nd Copy Blue Retain for a period of three years
Taxidermist 3rd Copy Green Taxidermist
Professional Hunter Last Copy Yellow Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities research projects and many more

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

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.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b) (6) [redacted]

Cell Phone (b) (6) [redacted]

Email address: [redacted]

x Individual

KNOW ALL MEN BY THESE PRESENTS: That x Wayne A. Hurst (Full Name of Person), residing at x (b) (6) [redacted] West Columbia, TX 77486 hereby constitutes and appoints each of the following persons - John Rulon CHB 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, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize 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 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 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 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 John Rulon CHB , who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

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 I 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, 1

(Print name) x (b) (6) [redacted]

has caused these [illegible]ned:

(Signature) x [redacted]

((Date) x 8/30/18

THIS REPORT ON FILE WITH ELEANORA BABIS

TIMBAVATI PRIVATE NATURE RESERVE

ANNUAL AERIAL CENSUS REPORT

19 September 2018

Compiled by:

Almero Bosch (TPNR Ecologist)

©

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INTRODUCTION

1.1 PREAMBLE

The Timbavati Private Nature Reserve forms part of the Greater Kruger Park, and is a member of the Associated Private Nature Reserves otherwise known as the APNR. The Timbavati Private Nature Reserve, herein further referred to as the TPNR, describes its vision for the overall long-term goal for the operation, protection and development of TPNR as follows: *To provide for ecologically and aesthetically sustainable (non-consumptive and consumptive) use of the area for its owners, based on wildlife focused recreation, tourism and hunting.*

The purpose of an organisation is the foundation on which all future action is based and must be in line with the overall management philosophy of the association. The purpose of the TPNR is thus defined as follows: *To conserve and maintain important aquatic and terrestrial habitat for wildlife conservation, ecosystem services and geological features whilst providing opportunities and benefits for sustainable nature based tourism and hunting whilst ensuring continued community support and beneficiation.*

Responsible wildlife management practices necessitated the monitoring of wildlife populations, the TPNR thus participates in active population monitoring of all mammalian species including carnivores. The scope of this report is to summarise the results for the annual aerial census conducted during September 2018. Please note that this report only provides information on the annual aerial census and that reports on other species and census techniques are published separately.

1.2 SURVEY AREA

The Timbavati Private Nature Reserve encompasses a total area of 530.2 km^2, and is situated between: -24.190 and -24.198 S and 31.227 and 31.278 E. The reserve forms part of the Greater Kruger Park and is situated directly west of the Houtboschrand and Kingfisherspruit sections. The TPNR furthermore forms part of the Associated Private Nature Reserves, with the Umbabat and Klaserie Private Nature Reserves bordering towards the north and north-west respectively.

The TPNR falls within the Lowveld Bushveld climatic region of South Africa (Kruger 2004). Average rainfall for the area ranges from 500-700mm per annum (Kruger 2004), with the long

term average for the Timbavati Headquarters station in the region of 573 mm per annum. The peak rainfall season for the reserve is between the months of November and March, with the highest temperatures recorded during the months of January and February, this is further characterised by high humidity.

Geomorphology of the TPNR is characterised by an undulating landscape with small crests and long mid-slopes often not abrupt towards a foot slope or drainage line. High points within the landscape are confined towards the east of the TPNR, with the highest point located within the farm of Johnniesdale (520m m.s.l), followed by the Ceylon farm (420m m.s.l). Both of these properties can be located on the eastern boundary of the TPNR. Dolerite pipe erosion surfaces are prominent within the northern section of the TPNR and result in abrupt pedalogical differences.

Hydrology and drainage of the area consists of the Klaserie River, the only perennial river within the area, and eight other non-perennial rivers. Water for game is mainly in the form of earth dams build within drainage lines and pumped water in troughs, usually in the vicinity of infrastructure such as lodges and camps. The TPNR falls within the savanna biome with a further classification by Mucina and Rutherford (2006) at a vegetation unit scale, as part of the following vegetation units; Granite Lowveld (35018 ha), Phalaborwa-Timbavati Mopaneveld (18192 ha) and the Gabbro Grassy Bushveld (709 ha).

The main structural vegetation units within the TPNR can be described as:

- *Colophospermum mopane* veld within the north,
- Open *Senegalia nigrescens/ Sclerocarya birrea* veld with in the central sections, and
- Open *Combretum/ Terminalia* veld within the south.

A well-defined phyto-mass gradient is evident on the TPNR and this can be attributed to the rainfall gradient present, from the dry northern sections to the more mesic southern sections.

A wide verity of ungulates and the full spectrum of the large carnivores occur within the TPNR. Species dominating the landscape include, but are not restricted to: Impala (*Aepyceros melampus melampus*), African Elephant (*Loxodonta africana*), Cape buffalo (*Syncerus caffer*), Giraffe (*Giraffa camelopardalis*), Zebra (*Equus quagga*) and Blue wildebeest (*Connochaetes taurinus*). Primate species include: Chacma baboon (*Papio hamadryas ursinus*) and the Vervet Monkey (*Cercopithecus aethiops*)

Iconic carnivore species include; Lion (*Panthera leo*), Leopard (*Panthera pardus*), Cheetah (*Acinonyx jubatus*), Spotted Hyena (*Crocuta crocuta*) and both Black-backed jackal (*Canis mesomelas*) and Side-stripped jackal (*Canis adustus*). Furthermore, less frequent species within the Greater Kruger region, which might occasionally venture into the TPNR include: Eland (*Tragelaphus oryx*), Roan (*Hippotragus equinus*), Tsessebe (*Damaliscus lunatus*) and Sable (*Hippotragus niger*).

1.3 SURVEY METHOD

The Total Area Count (TAC) survey conducted between 8-10 September 2018 was based on the standard total count method (Norton-Griffiths, 1978). This technique, with a standardised helicopter and flight paths, has been used in conjunction with the Agricultural Research Council (ARC)[1] since 1991. Standardisation is vital for comparison of data over time, with special emphasis on open systems, with trends rather than actual numbers being analysed.

The total of 530.2 km^2 was surveyed, using a bell 206 B Jet Ranger helicopter, with count marker bars fitted to each side of the aircraft. Each marker bar represents a 200m transect on each side of the aircraft when the target height of between 70-90m is reached (Annexure 1). Fight paths are spaced 500m apart, resulting in a total survey strip length of 1566.5 km. Count session duration was limited to the fuel capacity of the aircraft and the sessions per survey day are depicted in (Annexure 1). The survey crew consisted of the pilot, Front Seat Observer (FSO) and two Rear Seat Observers (RSO). Navigation and data collection during the survey was done by means of the "Capture[2]" software program, a multi-disciplinary geo-referencing and data capture program.

All mammalian species encountered during the census were counted, these included all ungulates and carnivores. Other non-mammalian species counted during the survey included:

- Raptors nests,
- Saddle billed Storks,
- Southern-Ground Hornbill, and
- Vulture nests.

[1] Agricultural Research Council, Dr Mike Peel. Range and Forage Institute, Nelspruit.
[2] Capture software, Mike Pingo/ Sunrise Aviation, South Africa.

Weather conditions for the majority of the census period were favourable, with the exception of the last 15 minutes of the first session on 8 September 2018 when sporadic rainfall was experienced and due to the poor visibility, the helicopter was forced to land 15 minutes early, while the weather cleared. Specifics related to climatic conditions are depicted in (Annexure 1).

1.3.1 FIXED-WING-BUFFALO COUNTS.

Individual Cape buffalo and small bachelor herds were counted using the method described above, however in the case of a large herd, a fixed-wing aircraft was used to take high resolution photographs of the herd once encountered. This practise lends itself to more accurate counts and a realistic estimation of natality within these herds.

1.3.2 RHINOCEROS DEMOGRAPHICS

Photographs were taken of each rhinoceros, both black and white, encountered during the survey out of the helicopter. A photograph time and data record time was correlated to ensure all individuals on the photographs were accounted for. Ageing was done by utilizing the rhinoceros ageing guide of Adcock and Emslie (IUCN Publication)[3]. Due to the sensitive nature of this data set, rhinoceros demographics will only be used for specialist reports and not be distributed.

[3] Adcock and Emslie, African Rhino Monitoring Guide/ IUCN, Rhino Specialist Group

RESULTS

2.1 COUNT TOTALS

Results for species of importance are given in (Table 1). Impala (8233), Cape buffalo (1619), Burchell's zebra (856) African elephant (768) and blue wildebeest (635) were the most numerous species counted during the survey. Nyala (24) and bushbuck (2) numbers are low due to habitat selection of these cryptic species (riverine vegetation), and as a result these numbers cannot be seen as a true reflection.

A single Sable antelope bull was also recorded; this animal was seen at the pan close to Mopani camp on the farm Ceylon. Other species seen during the survey are depicted in (Table 2) with the following species counted within the Ngala concession area, warthog (2), impala (33), African elephant (3) and steenbok (1).

Table 1 Important species results (2018 TPNR aerial census).

Species	Count
Blue Wildebeest	635
Cape Buffalo	1619
Duiker	31
African Elephant	768
Giraffe	309
Hippopotamus	103
Impala	8322
Kudu	448
Nyala	24
Black Rhinoceros	** Not disclosed for security reasons*
White Rhinoceros	** Not disclosed for security reasons*
Steenbok	47
Vulture Nest	72
Warthog	196
Waterbuck	282
Burchell's Zebra	856

Table 2 Other species counted during the census.

Species	Count
Black-backed Jackal	3
Cheetah	1
Honey Badger	5
Leopard	2
Lion	16
Ostrich	1
Raptors nest	7
Southern Ground-Hornbill	38
Spotted Hyena	26
Vulture nest	72

2.2 IMPORTANT SPECIES DENSITY AND DISTRIBUTION

The overall animal density of all species counted during the survey was 28.3 animals/km^2. Densities of all important species as depicted in (Table 1) are at 26.2 animals/km^2. Density figures for individually important species are depicted in (Table 3). Important distribution notes are the increase of both Vulture nests and Impala within the north of the TPNR as well as the occurrence of African elephant and Kudu in close proximity to drainage lines. The distribution maps of all significant species within the TPNR are depicted in (Annexures 2 to12).

Table 3 Densities of important species counted during the 2018 Aerial census

Species	Density (no/km^2)
Blue wildebeest	1.20
Cape Buffalo	3.05
Duiker	0.06
African Elephant	1.45
Giraffe	0.58
Hippopotamus	0.19
Impala	15.70
Kudu	0.85
Nyala	0.05
Steenbok	0.09
Vulture Nest	0.14
Warthog	0.37
Waterbuck	0.53
Burchell's Zebra	1.62

2.3 BIOMASS

Total animal biomass for important species over the total survey area was 6381 kg/km^2 (Table 4), using biomass conversions according to Meissner *et.al.*,(1983). African elephant was the single highest contributor to animal biomass with 39% of the biomass assigned to this species followed by Cape buffalo at 27.5%. Other species with high contributions to total animal biomass were impala (9.9%), white rhinoceros (7.7%), giraffe (6.9%) and Burchell's zebra (5.1%).

Table 4 Biomass of important species during the 2018 Aerial census

Species	Biomass kg/km^2	% of Total biomass
Blue Wildebeest	147.37	2.33
Cape Buffalo	1374.62	21.75
Duiker	0.58	0.01
African Elephant	2499.62	39.56
Giraffe	437.26	6.92
Hippopotamus	194.34	3.08
Impala	628.08	9.94
Kudu	114.96	1.82
Nyala	3.31	0.05
Black Rhinoceros	6.16	0.10
White Rhinoceros	486.79	7.70
Steenbok	0.80	0.01
Vulture Nest	0.00	0.00
Warthog	16.64	0.26
Waterbuck	85.13	1.35
Burchell's Zebra	323.02	5.11

Biomass interpretation can be done by grouping the important species into the following broad classes representing feeding habits; Pachyderms, including buffalo, Grazers, Browsers and Intermediate feeders. It is important to note that these broad feeding classes and respective biomass will directly indicate the competition for herbaceous and woody resources on the TPNR.

A comparison between the 2017 and 2018 aerial census results is made in terms of average biomass/ broad feeding class (Figure 1). It is important to note both Cape buffalo and African elephant numbers are higher in the 2018 census. Densities and biomass of species grouped into these broad feeding classes are depicted in (Figures 2 to 4), based on the 2018 census results. Figures 5 to 8 further refer to the trends in herbivore feeding classes, i.e. feeding class 1 to feeding class 4.

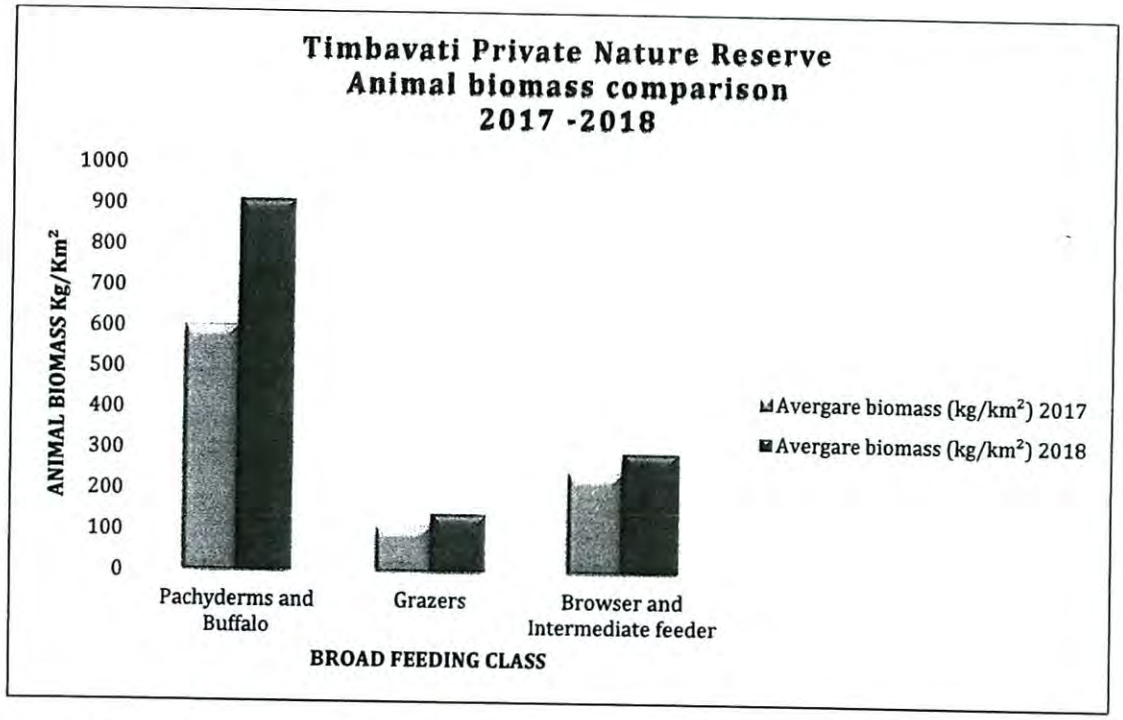


Figure 1 Biomass comparison between 2017 and 2018 for respective broad feeding classes, September 2018.

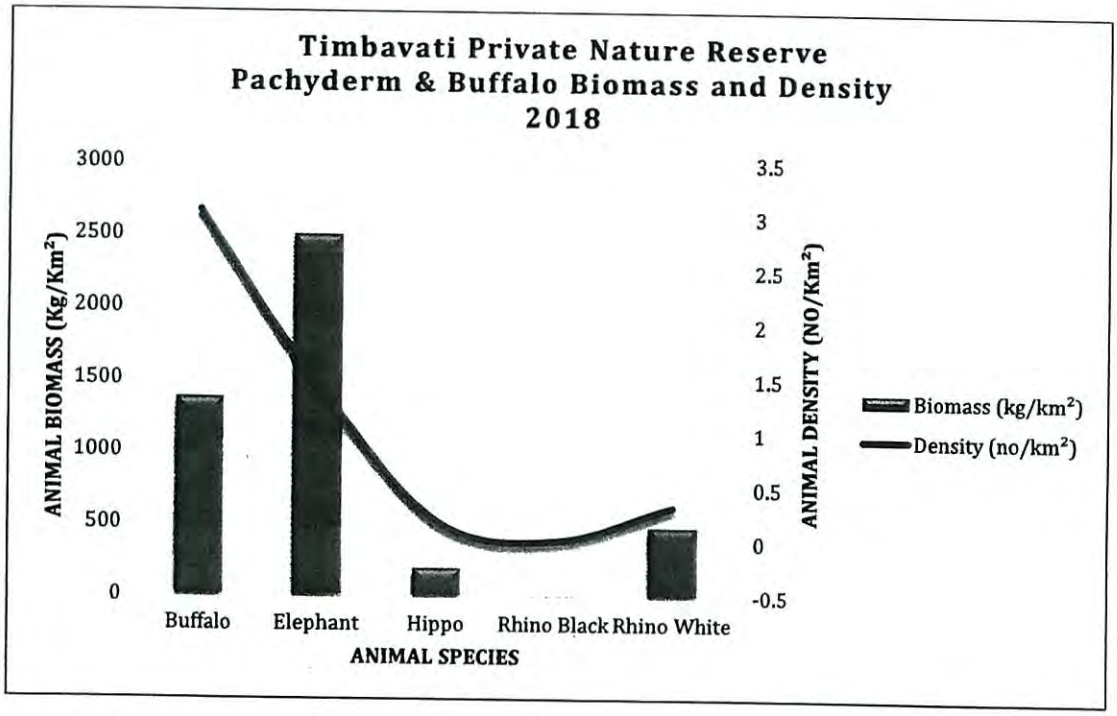


Figure 2 Biomass and density for Pachyderms and buffalo as a broad feeding class, September 2018.

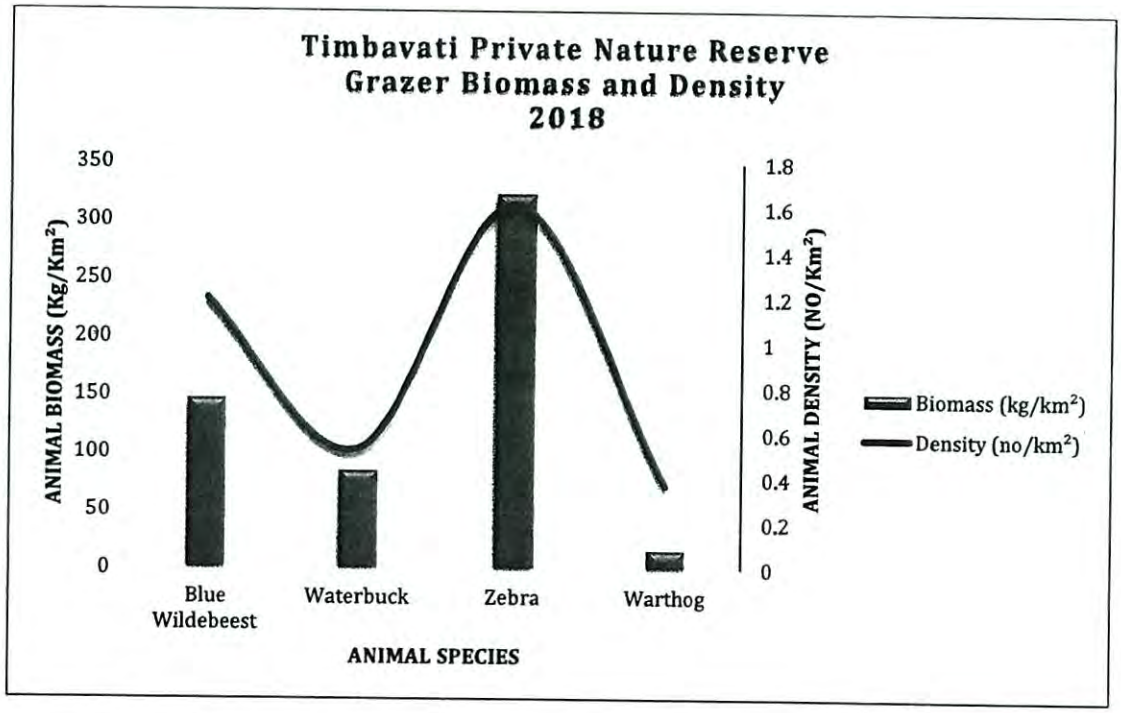


Figure 3 Biomass and density for grazers, September 2018.

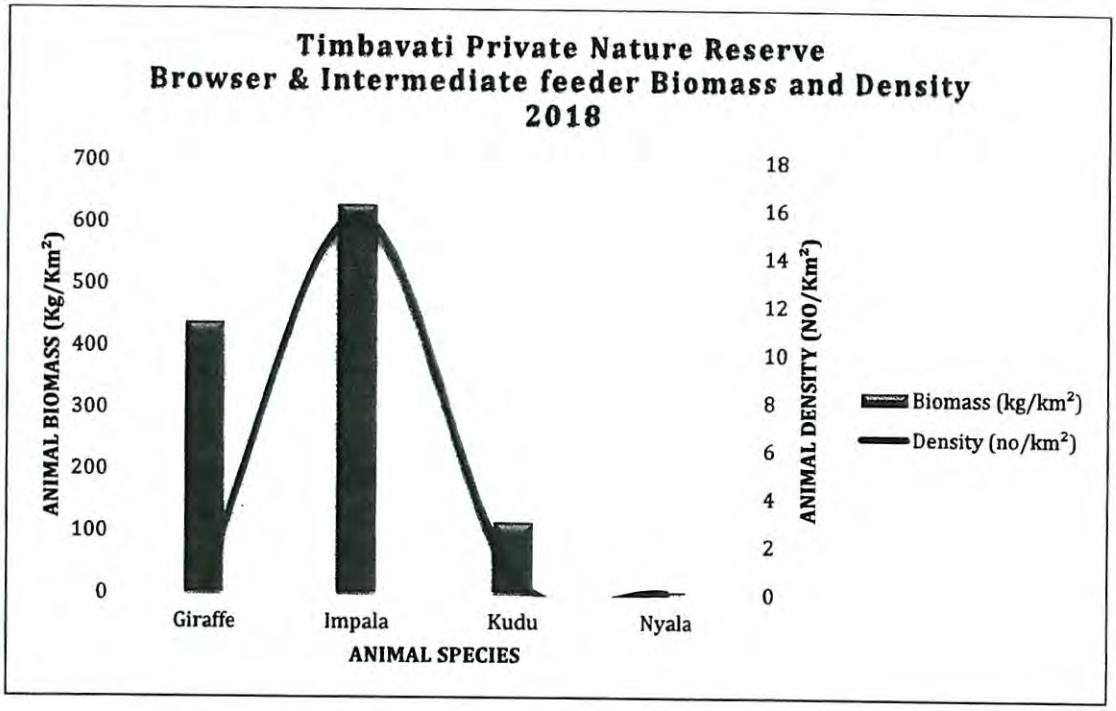


Figure 4 Biomass and density for browser and intermediate feeders, September 2018.

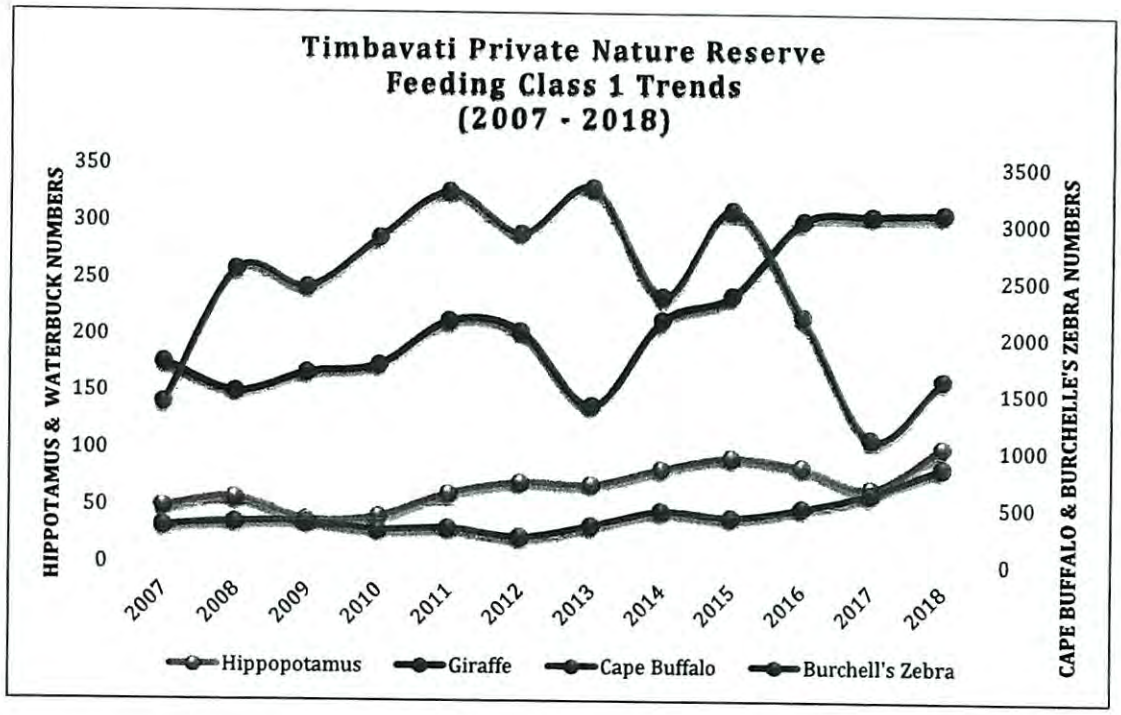


Figure 5 Graph illustrating the feeding class 1 species trends within the Timbavati Private Nature Reserve, 2007 – 2018.

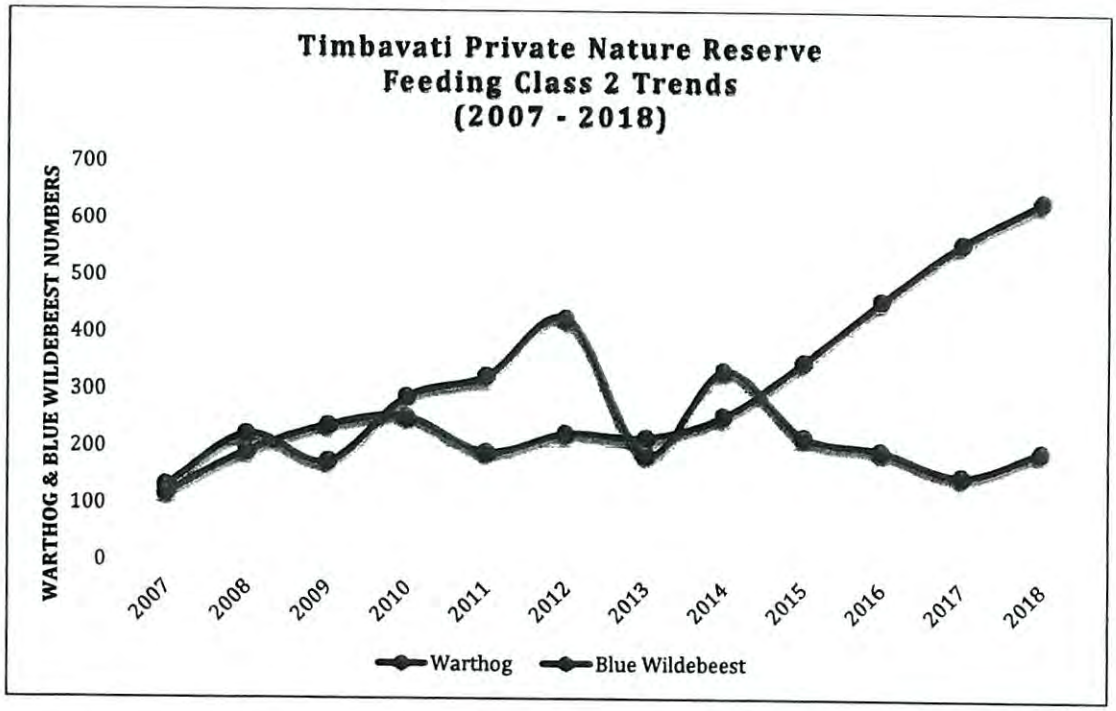


Figure 6 Graph illustrating the feeding class 2 species trends within the Timbavati Private Nature Reserve, 2007 – 2018.

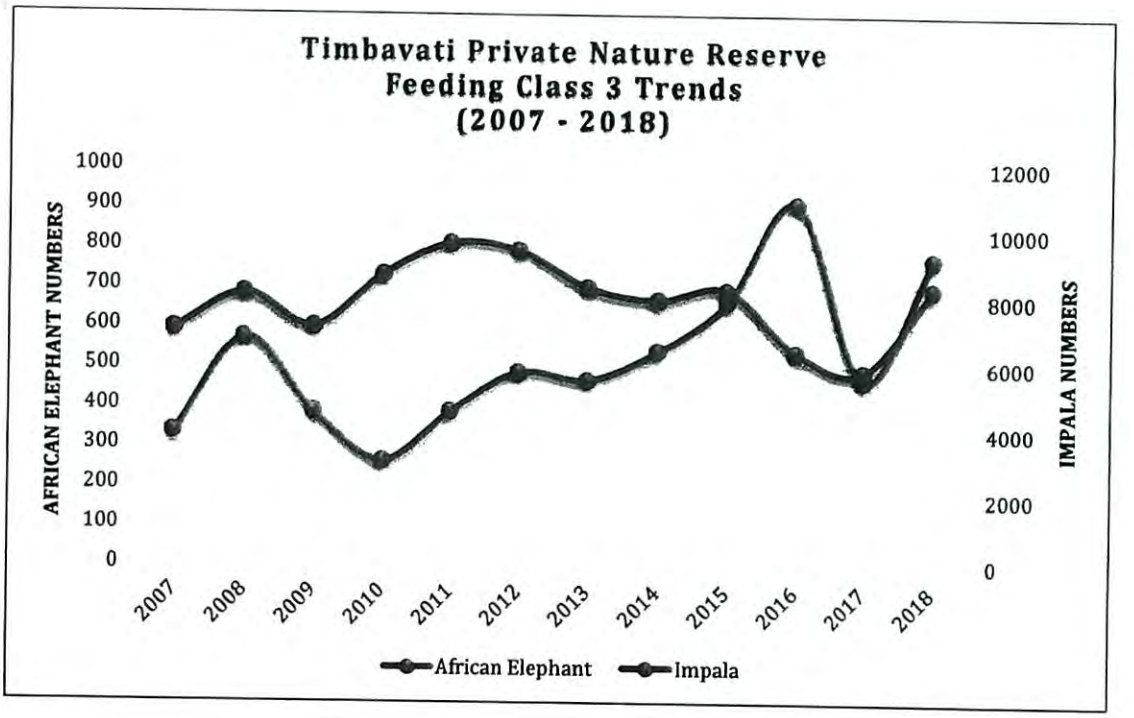


Figure 7 Graph illustrating the feeding class 3 species trends within the Timbavati Private Nature Reserve, 2007 – 2018.

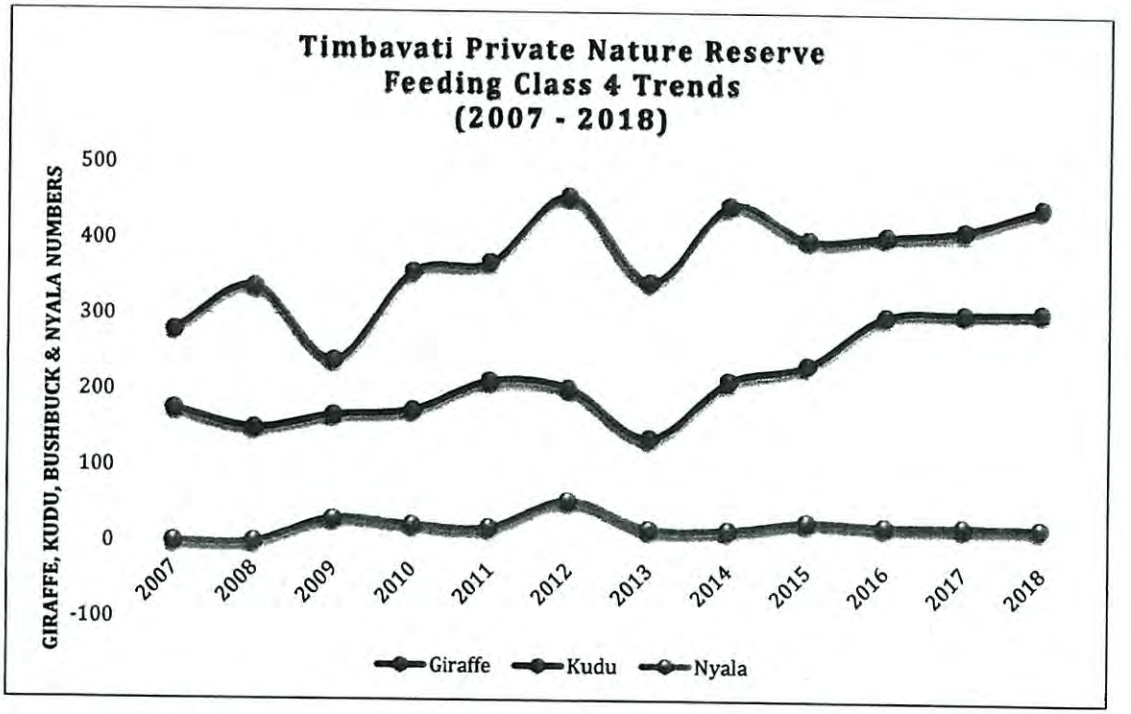


Figure 8 Graph illustrating the feeding class 4 species trends within the Timbavati Private Nature Reserve, 2007 – 2018.

METHOD OF ASSESSMENT

Population numbers as recorded during the 2018 census in general is satisfying if compared to the long term data set (Bosch, 2009). Climatic conditions prevailing from 2015-2017 have negatively influenced population numbers to a varying extend. Populations have shown positive growth according to the 2018 results.

Antelope species such as Nyala, Duiker and Steenbok are difficult to count during aerial surveys due to their cryptic colouration, habitat, size and behaviour if disturbed. These species numbers are given for reference purposes only.

3.1 POPULATION GROWTH

3.1.1 BLACK RHINOCEROS

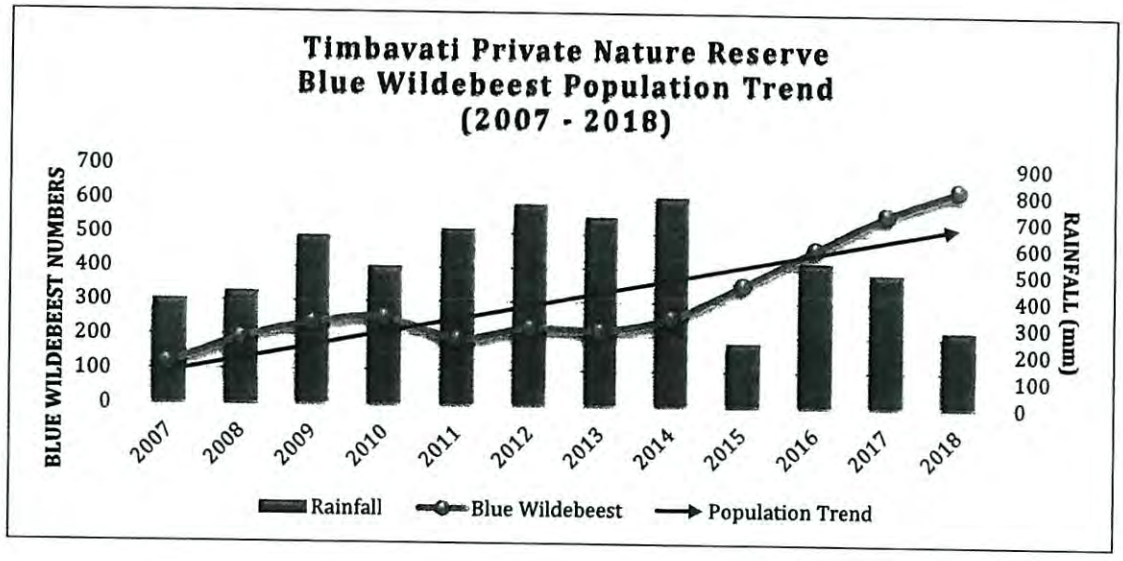
This species have shown a decrease of 20% during the 2018 census. The species is known to have an erratic growth figure within the TPNR. This is mainly due to the movement of only a few individuals within 15% of the TPNR. This species is highly selective in terms of habitat and are also known to be explorative. With the incorporation of Thorny Bush Game Reserve (TBGR) as part of the APNR, new habitat for exploration was opened; movement between the TPNR, Kruger Park and TBGR is inevitable.

3.1.2 WHITE RHINOCEROS

White Rhinoceros have shown an increase of 14% during the 2018 census. Numbers for this species are stable in relation to the long term dataset. A total of 31 calves (0-1,5years of age) were counted during the 2018 census.

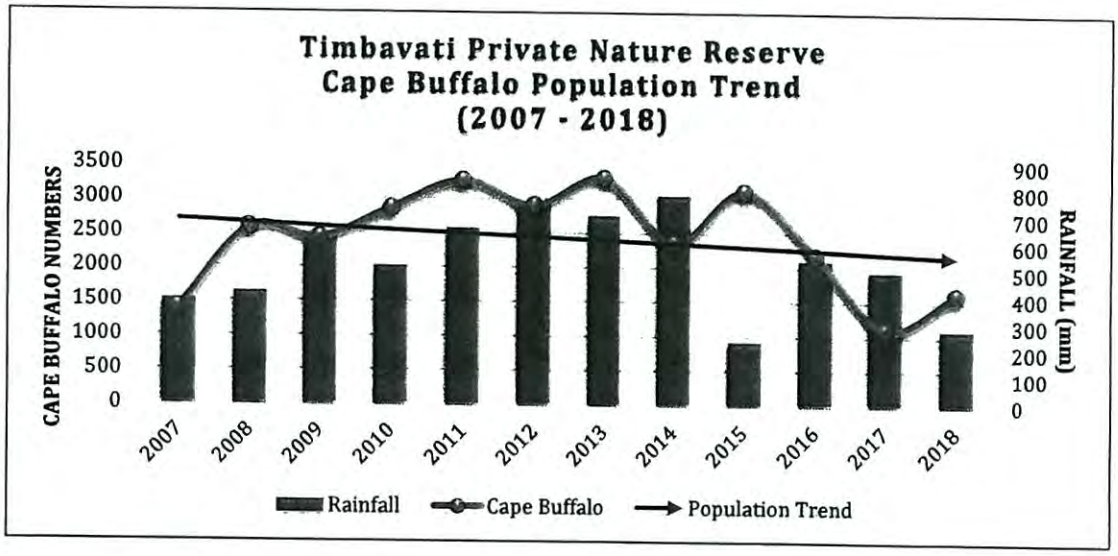
3.1.3 BLUE WILDEBEEST

This ungulate species have shown a 13% increase during the 2018 census. Blue wildebeest have also shown a drastic increase in numbers from 2010 (252) to 2018 (635), incorporation and water policies can be ascribed to this increase in numbers over years.



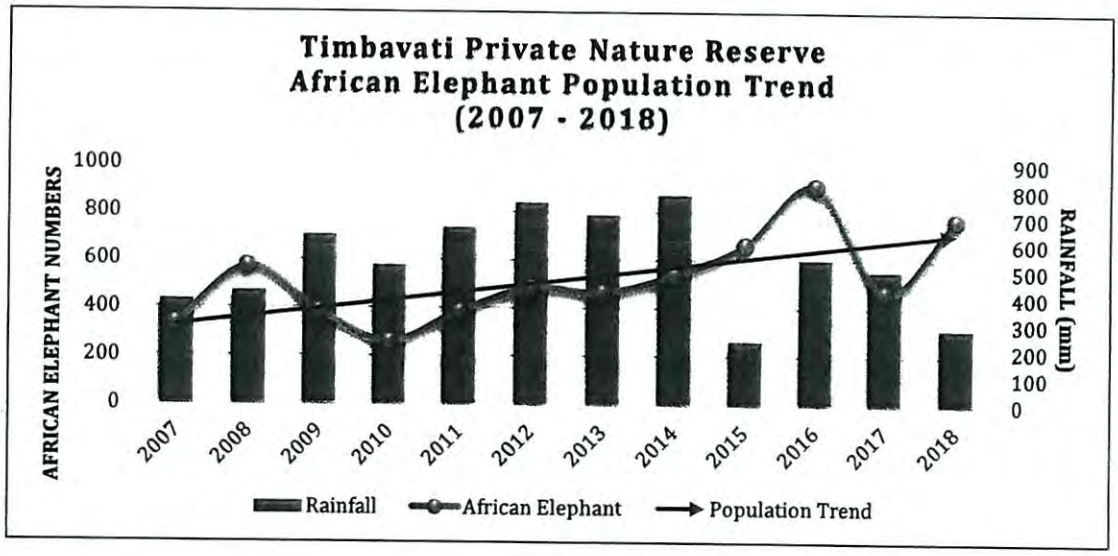
3.1.4 CAPE BUFFALO

Cape buffalo numbers are increasing slowly after the drought period with a 46% increase during the 2018 census. Buffalo herds are becoming larger and more frequently seen on the reserve. The count of 1619 is still low in relation of the long term dataset average of 2400-2500 individuals for the TPNR management area.



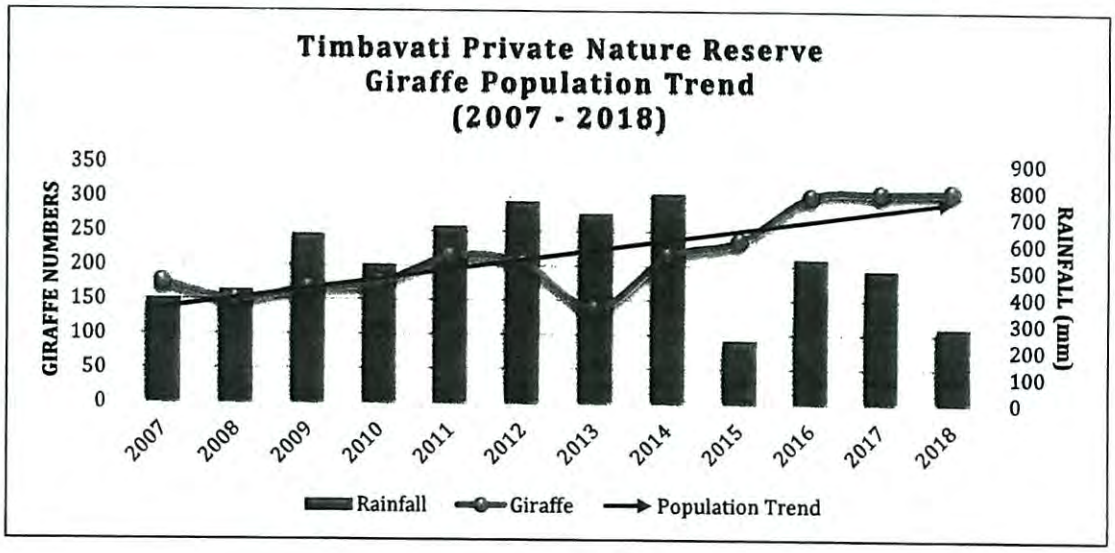
3.1.5 AFRICAN ELEPHANT

This species showed a 65% increase during the 2018 census. Elephant is the species with the highest percentage increase during the 2018 census. This species contributes the most (39%) to overall animal biomass on the TPNR, the constant increase of this species can be ascribed to water policies.



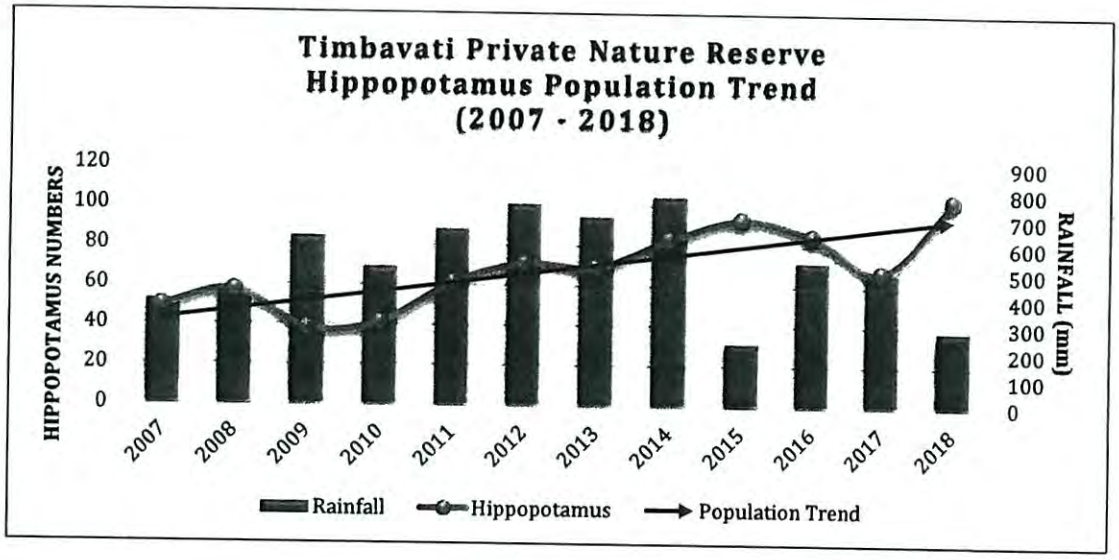
3.1.6 GIRAFFE

This species have shown a 0.7% increase during the 2018 census. The population is stable with little variation as from the 2016 census.



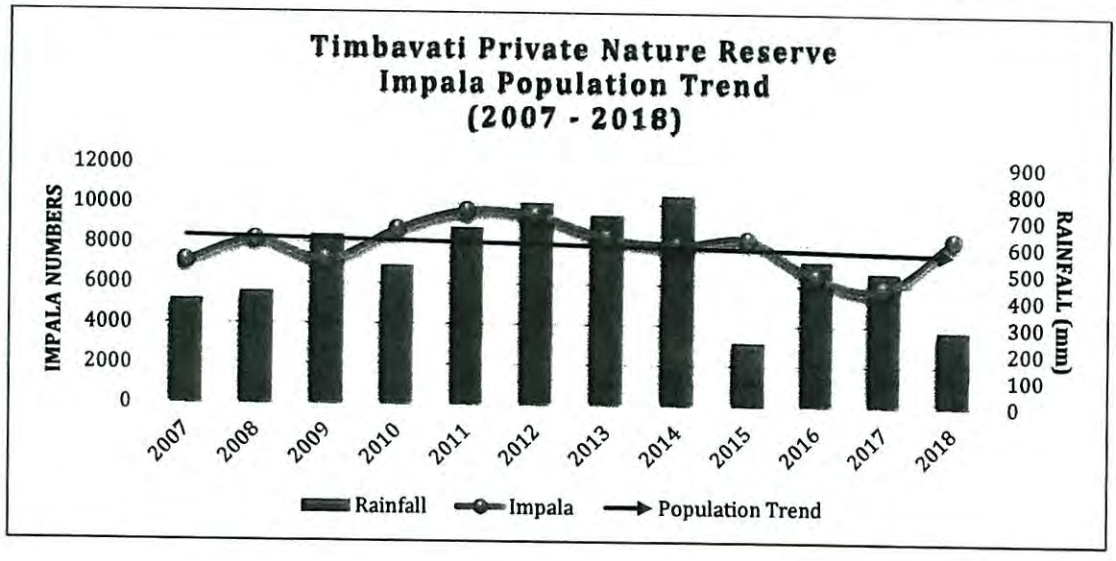
3.1.7 HIPPOPOTAMUS

This species have increased by 54% from the 2017 census. The TPNR hippopotamus population has always been stable with the exception of the 2015 count when habitat conditions during the drought influenced the population negatively.



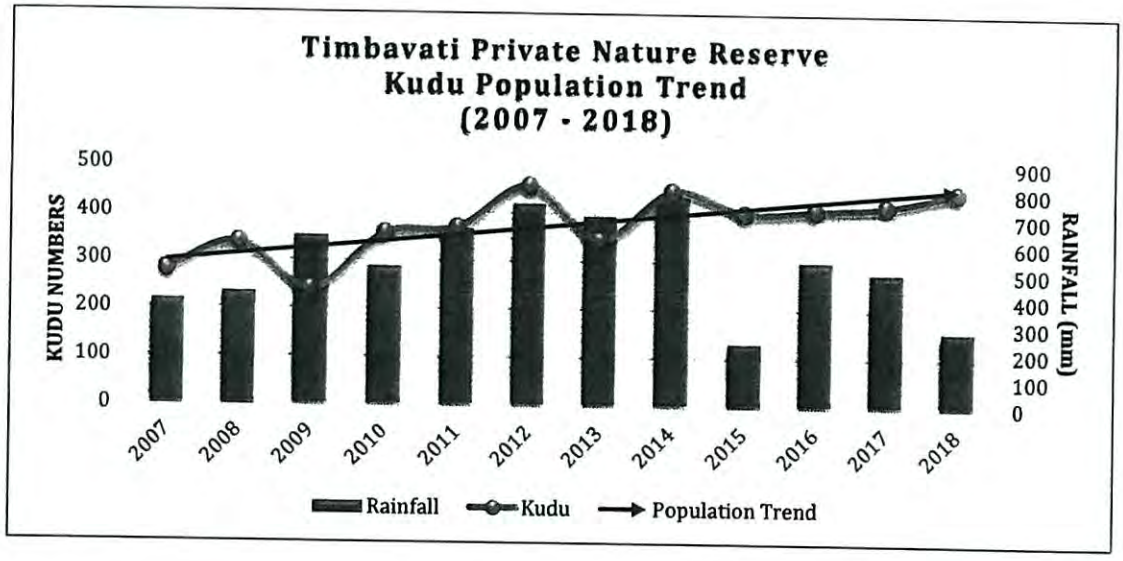
3.1.8 IMPALA

Impala, second to elephant, have the highest percentage increase (42%) during the 2018 census. This species count has always been the highest of all ungulates on the TPNR with fluctuations between years. The increase of this species in particular can be ascribed to water policies.



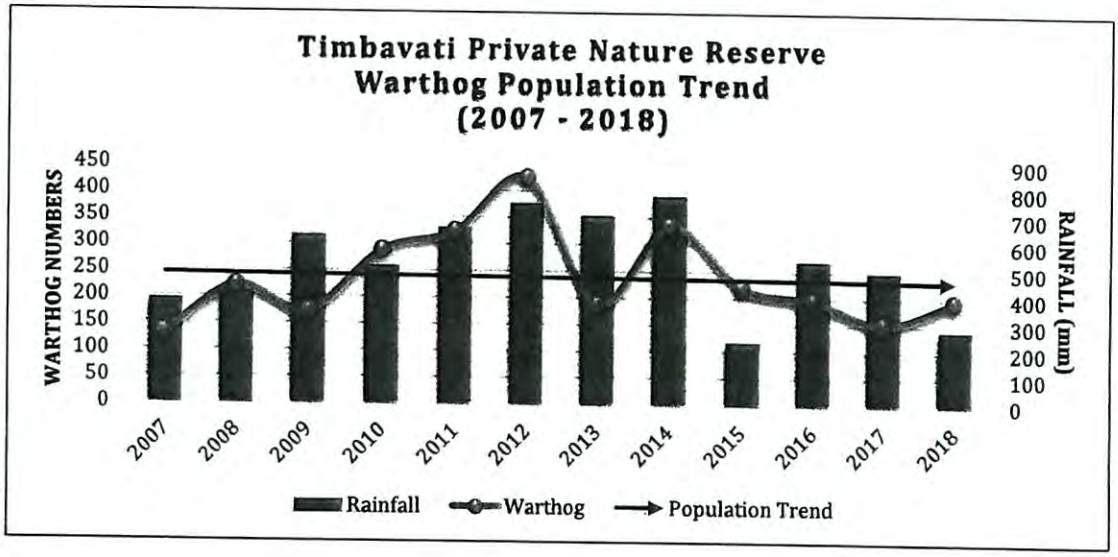
3.1.9 KUDU

Kudu numbers have increased with 7%. This is a welcoming increase as the population showed a decline of 10% during the 2015 census, with a recovery of 1.4% and 2.2% during 2016 and 2017 respectively. The population remains stable.



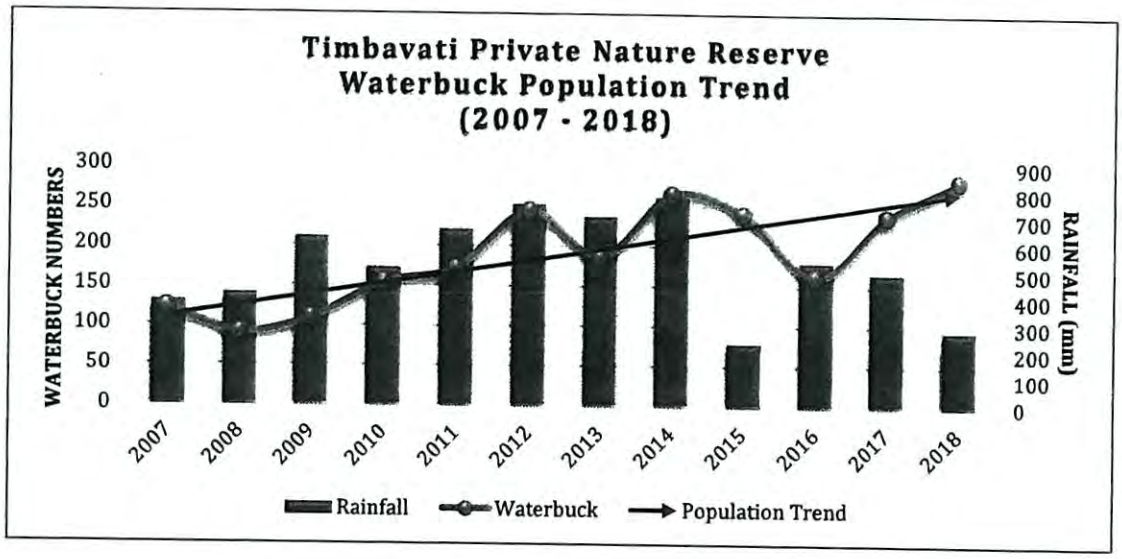
3.1.10 WARTHOG

Warthog numbers have increased by 29% during the 2018 census, the second highest increase after the 2010 increase of 66%. This increase might be short term as this species is known to increase drastically when conditions are favourable after a drought. The population is expected to stabilise when we enter a normal rainfall cycle.



3.1.11 WATERBUCK

This species increased by 19% during the 2018 census. This increase is welcoming as the species have shown a combined 41% decrease for the years 2015-2016. The waterbuck population is stable with climatic factors influencing the decline over the 2015-2016 periods.



3.1.12 BURCHELL'S ZEBRA

This species increased by 37% during the 2018 census. Zebra numbers have started to increase as from 2013 with the exception of 2015 when results showed an 11.1% decrease. The population is stable and with the incorporation of TBGR to the APNR, structural habitat attributes brought about by fire and Elephant impact can be seen as the main drivers of population increase for this species.

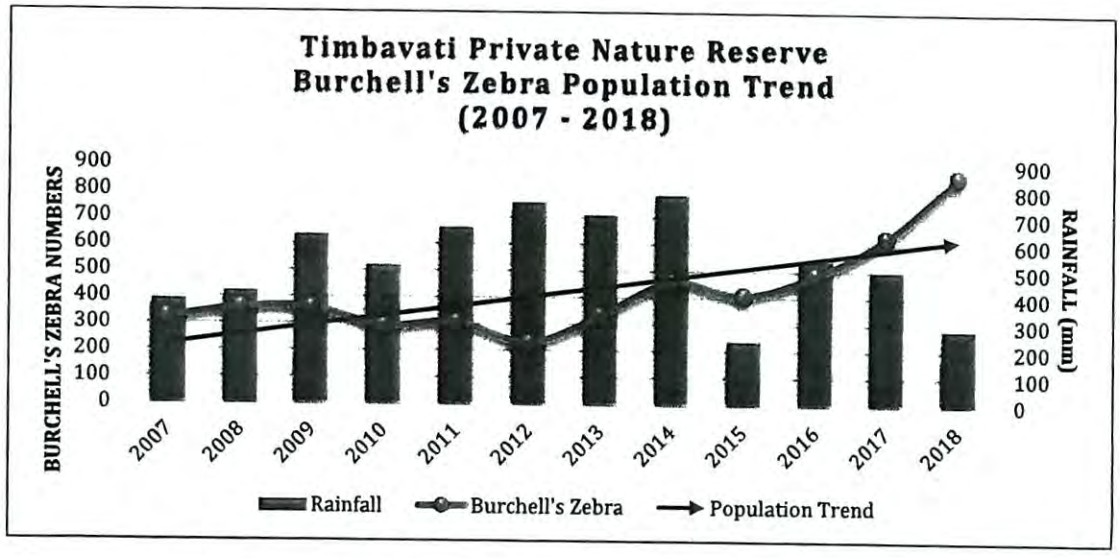


Table 5 Biomass of important species during the 2018 Aerial census

Species	2018	2017	Variance	%Variance
African Elephant	768	465	303	65.2%
Black Rhinoceros	** Removed for security reasons*			-20.0%
Blue Wildebeest	635	561	74	13.2%
Burchell's Zebra	856	626	230	36.7%
Cape Buffalo	1619	1106	513	46.4%
Giraffe	309	307	2	0.7%
Hippopotamus	103	67	36	53.7%
Impala	8322	5844	2478	42.4%
Kudu	448	417	31	7.4%
Warthog	196	152	44	28.9%
Waterbuck	282	237	45	19.0%
White Rhinoceros	** Removed for security reasons*			13.9%

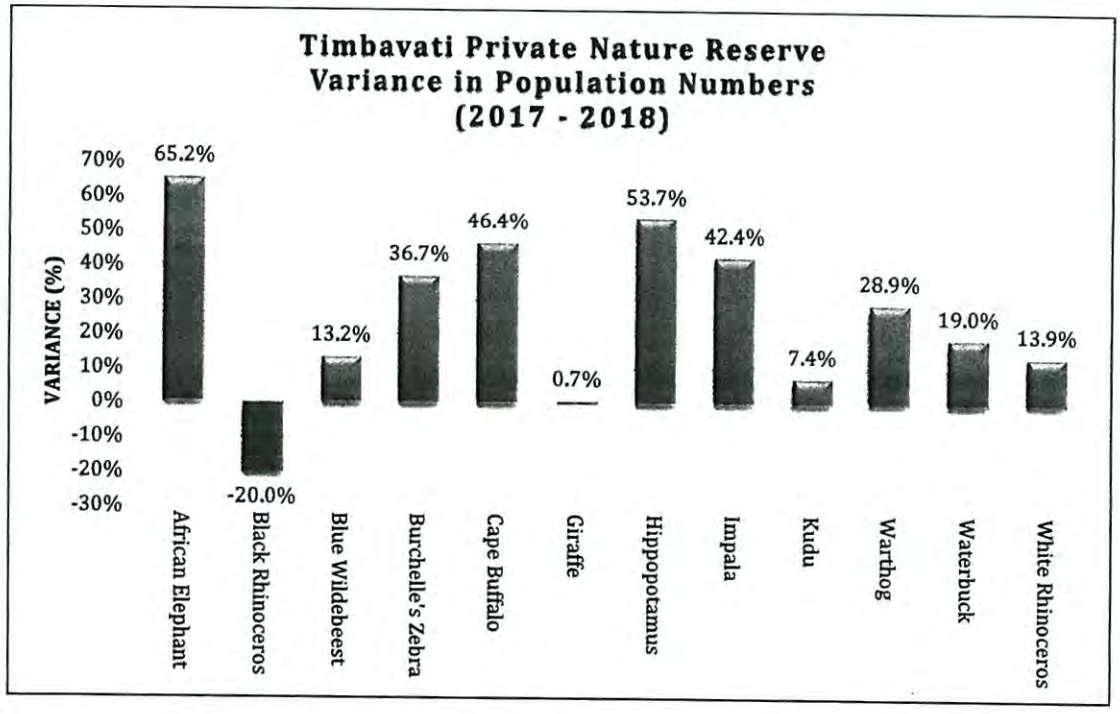


Figure 9 Graph illustrating the variance in population numbers in focus species between 2007 and 2018.

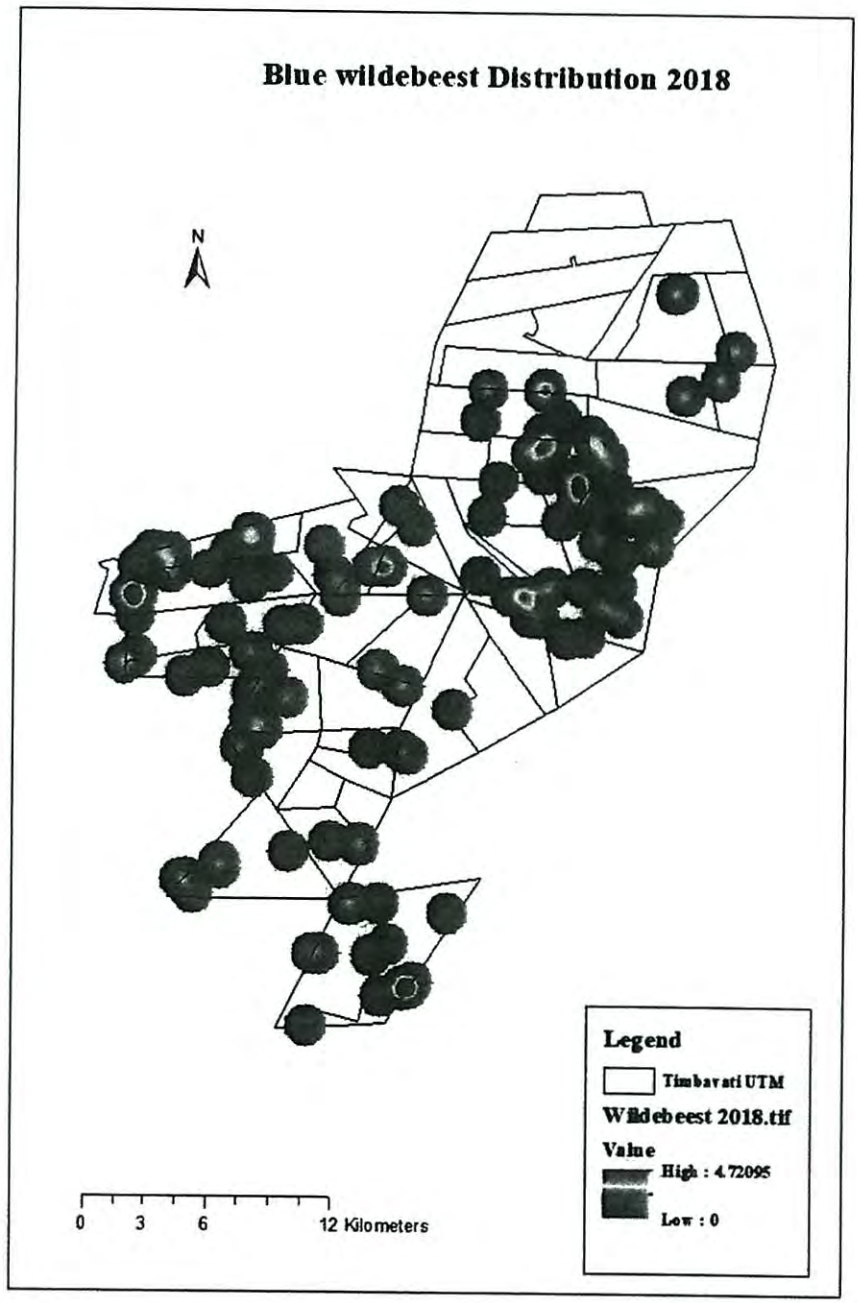
ANNEXURE A – SURVEY PARAMETERS TAC

ANNEXURE 1: Survey parameters Total Area Count (TAC), TPNR 8-10 September 2018.

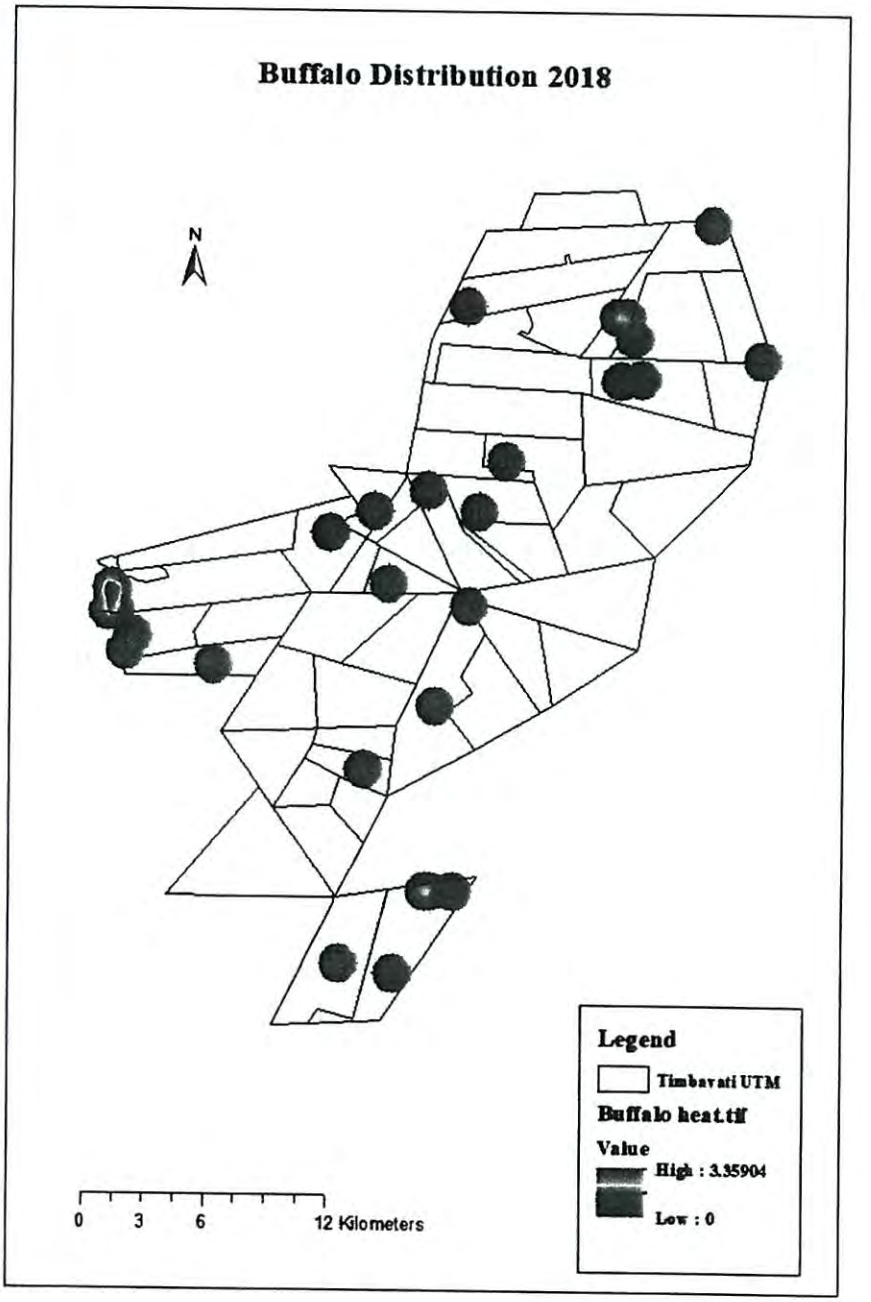
Survey date	8-10 September 2018
Survey area	Timbavati Private Nature reserve. Ngala concession area as depicted
Type of Survey	Total Area Count
Helicopter	Bell Jet Ranger 206 B
	Survey Crew
Pilot:	Mr Mike Pingo (Sunrise Aviation)
Front Seat Observer & data recording	Almero Bosch
Rear Seat Observers	Candice Pierce (one session), Daniel Ball, Edwin Pierce and Kathleen Gibson
Survey strip spacing	500m
Survey height	70-90m
Number of survey sessions	**Day 1:** Session 1: 2h:00 min Session 2: 2h:15 min Session 3: 1h:50 min **Day2:** Session 1: 2h:35 min Session 2: 1h:55 min Session 3: 2h:25 min **Day3:** Session 1: 2h:35 min Session 2: 2h:10 min Session 3: 2h:35 min
Total survey strip length	1566.5 km
Average survey flight speed	90-110 km/hr
Survey time	20.3 hours
Weather conditions	**Day1: 8 September 2018** 19°C-21°C. Light rain within the far South, high clouds, and good visibility on ground.
	Day2: 9 September 2018 15°-23°C. Good visibility during the day.
	Day 3: 10 September 2018 19°-26°C. Good visibility during the day.

ANNEXURE B – DISTRIBUTION MAPS

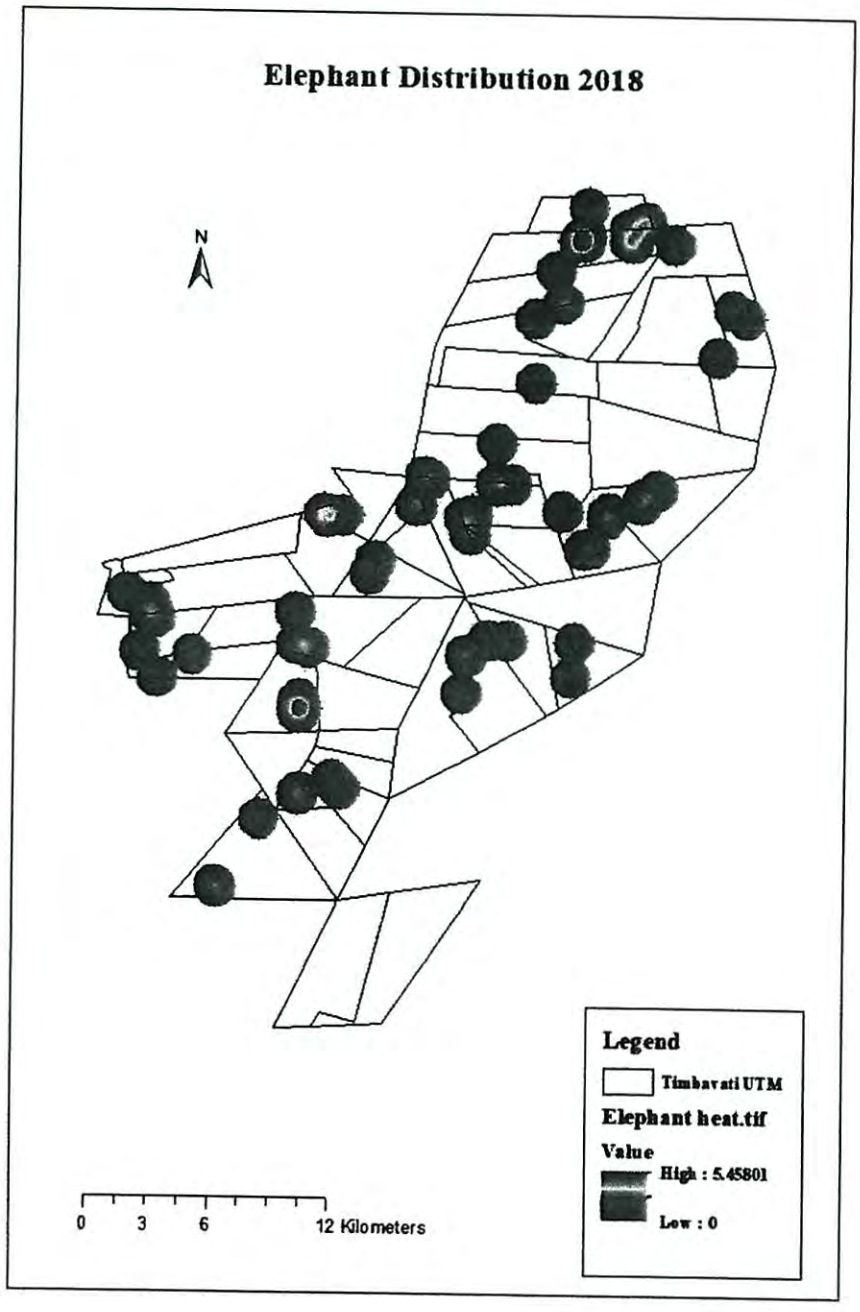
ANNEXURE 2: Blue wildebeest distribution during the 2018 aerial census.



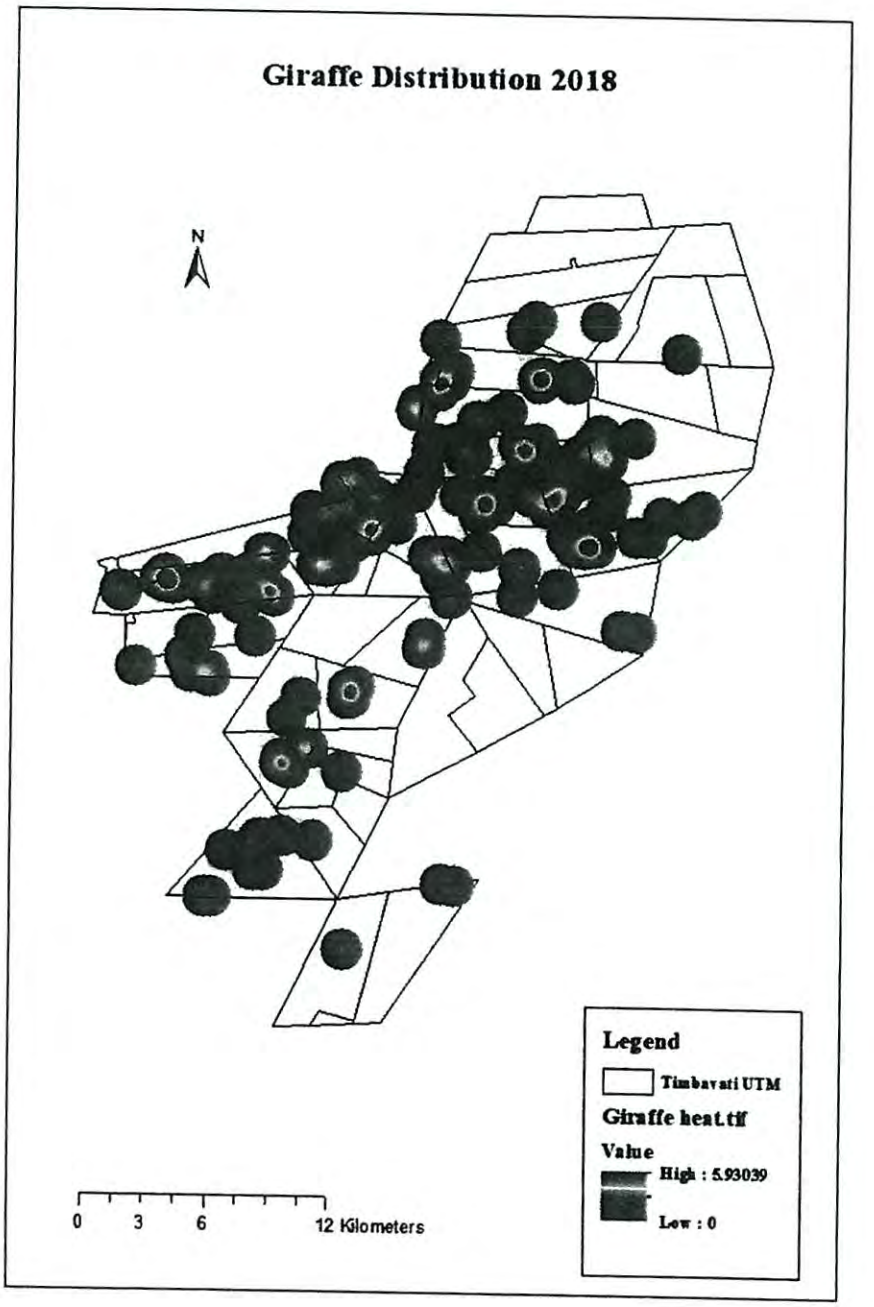
ANNEXURE 3: Cape buffalo distribution during the 2018 aerial census



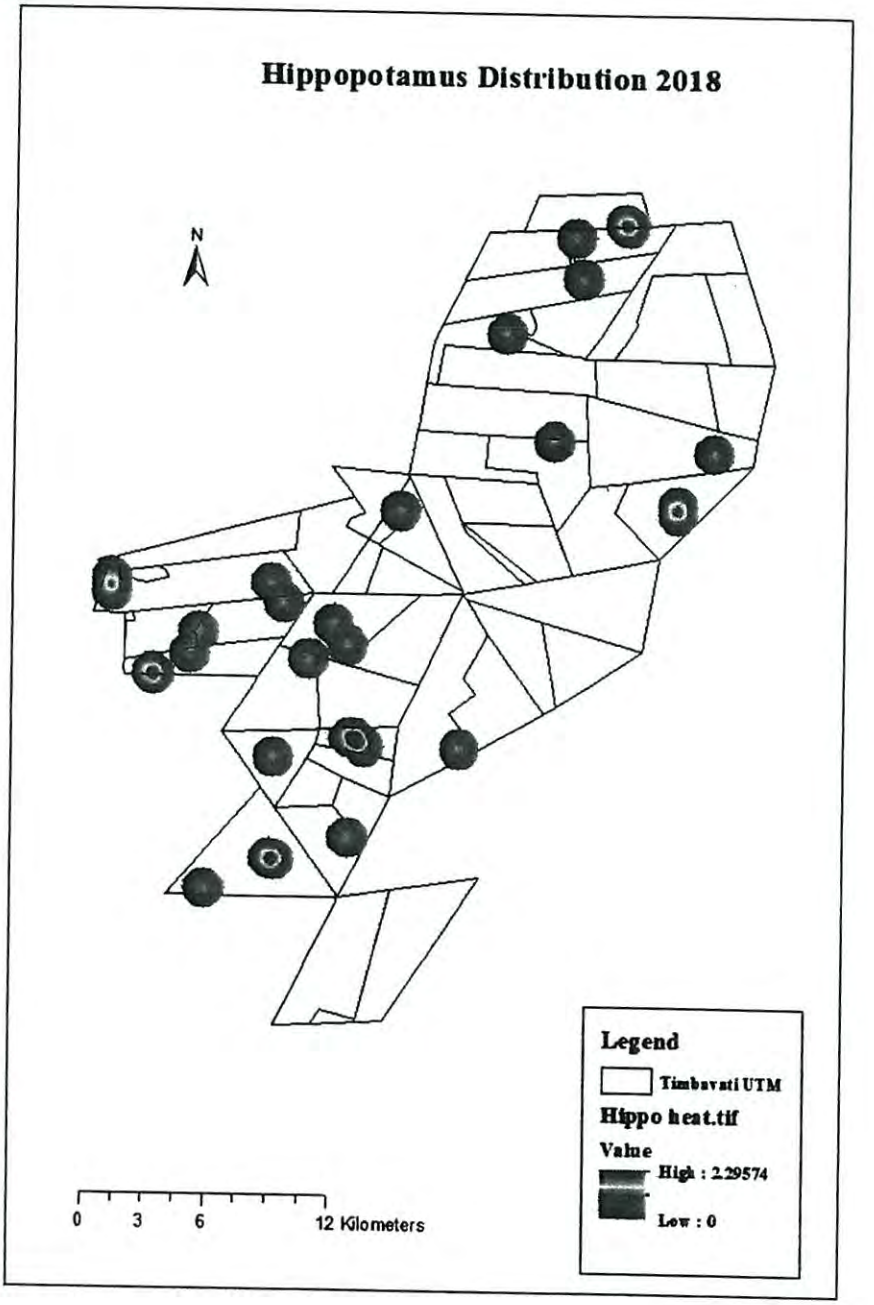
ANNEXURE 4: African elephant distribution during the 2018 aerial census.



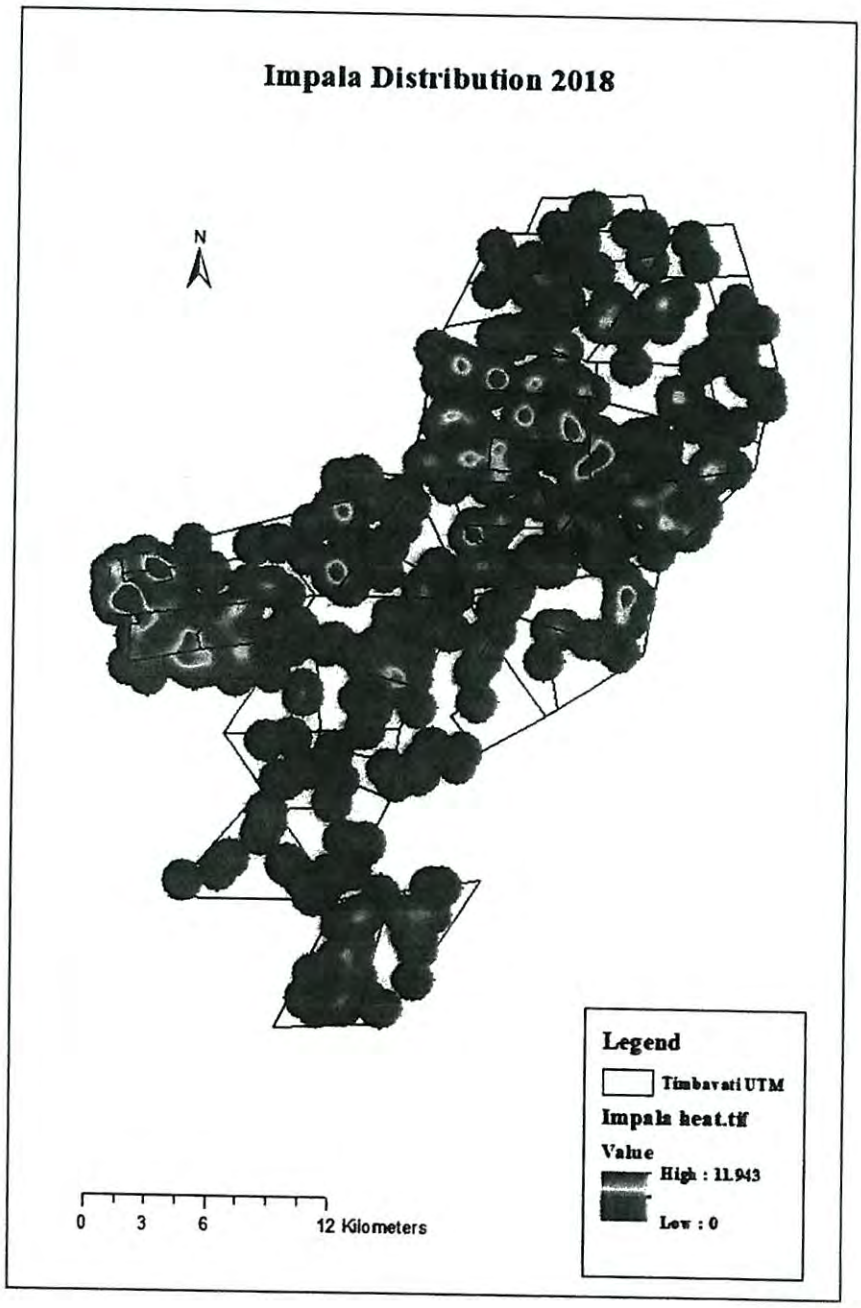
ANNEXURE 5: Giraffe distribution during the 2018 aerial census.



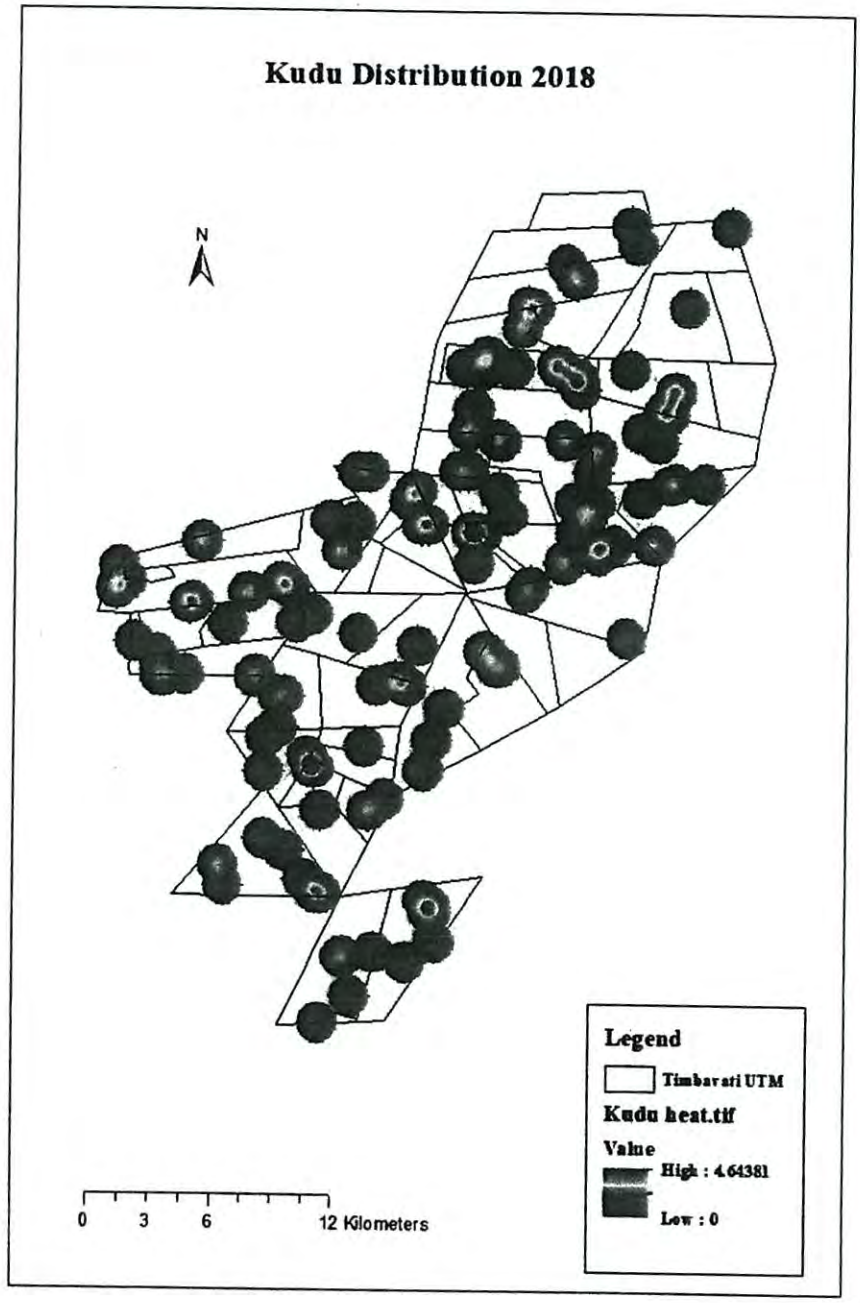
ANNEXURE 6: Hippopotamus distribution during the 2018 aerial census.



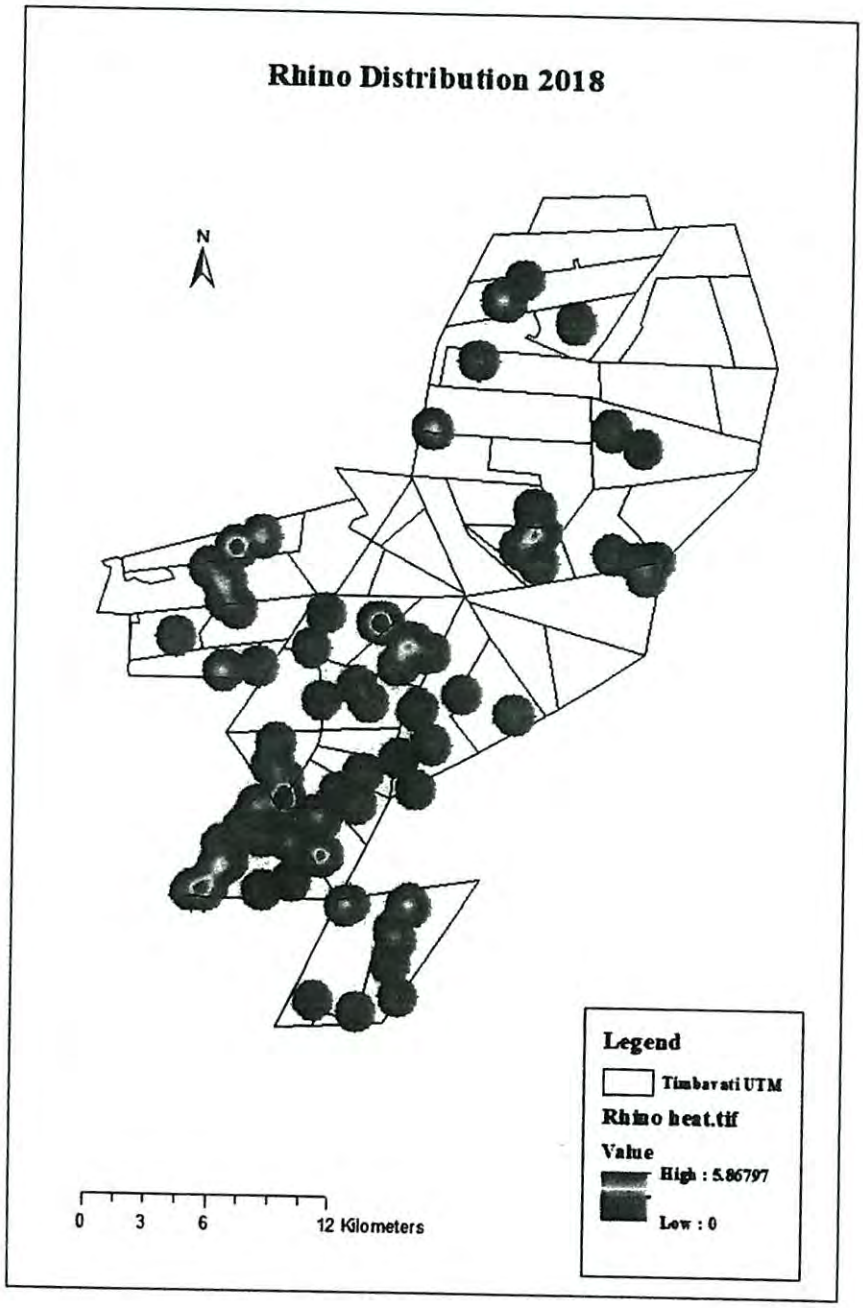
ANNEXURE 7: Impala distribution during the 2018 aerial census.



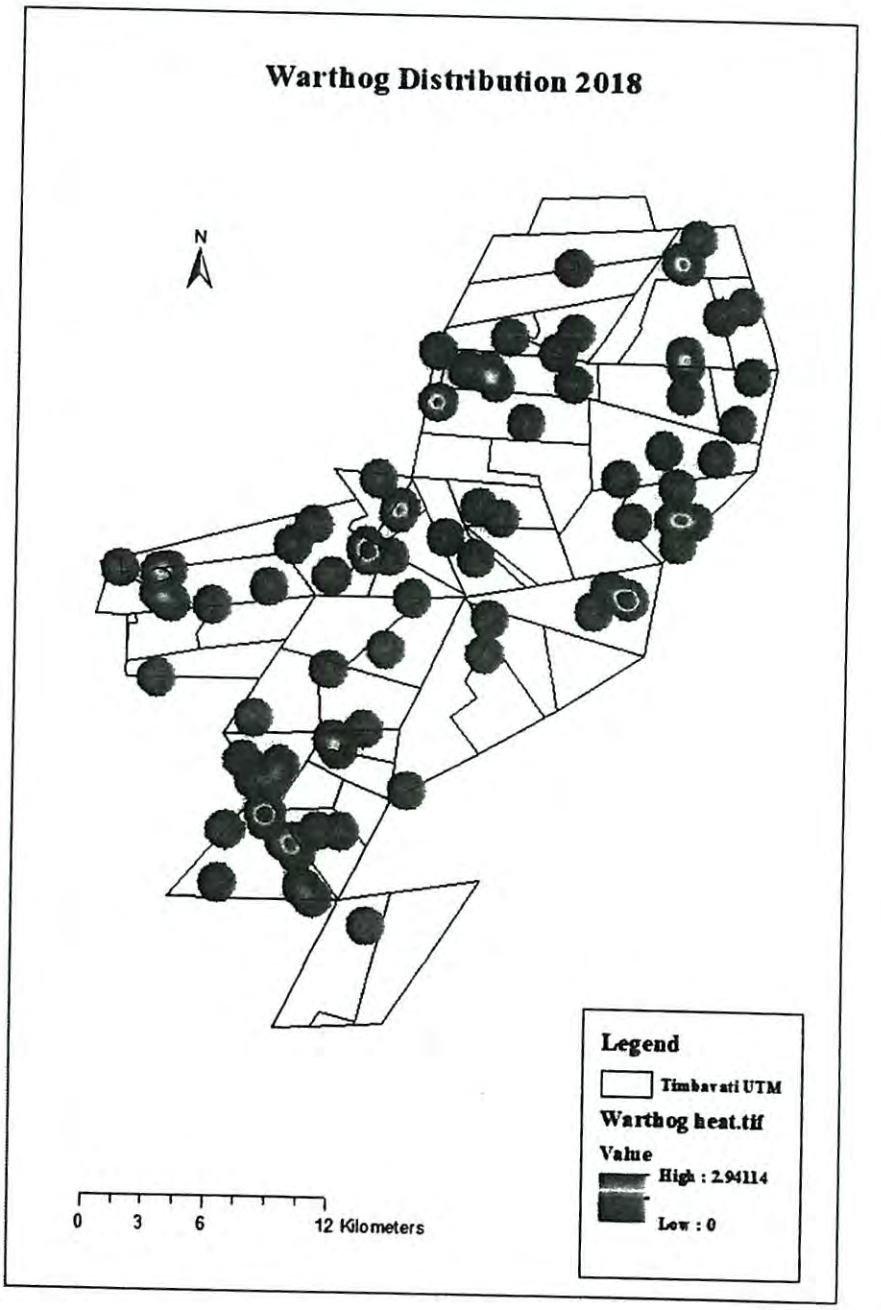
ANNEXURE 8: Kudu distribution during the 2018 aerial census.



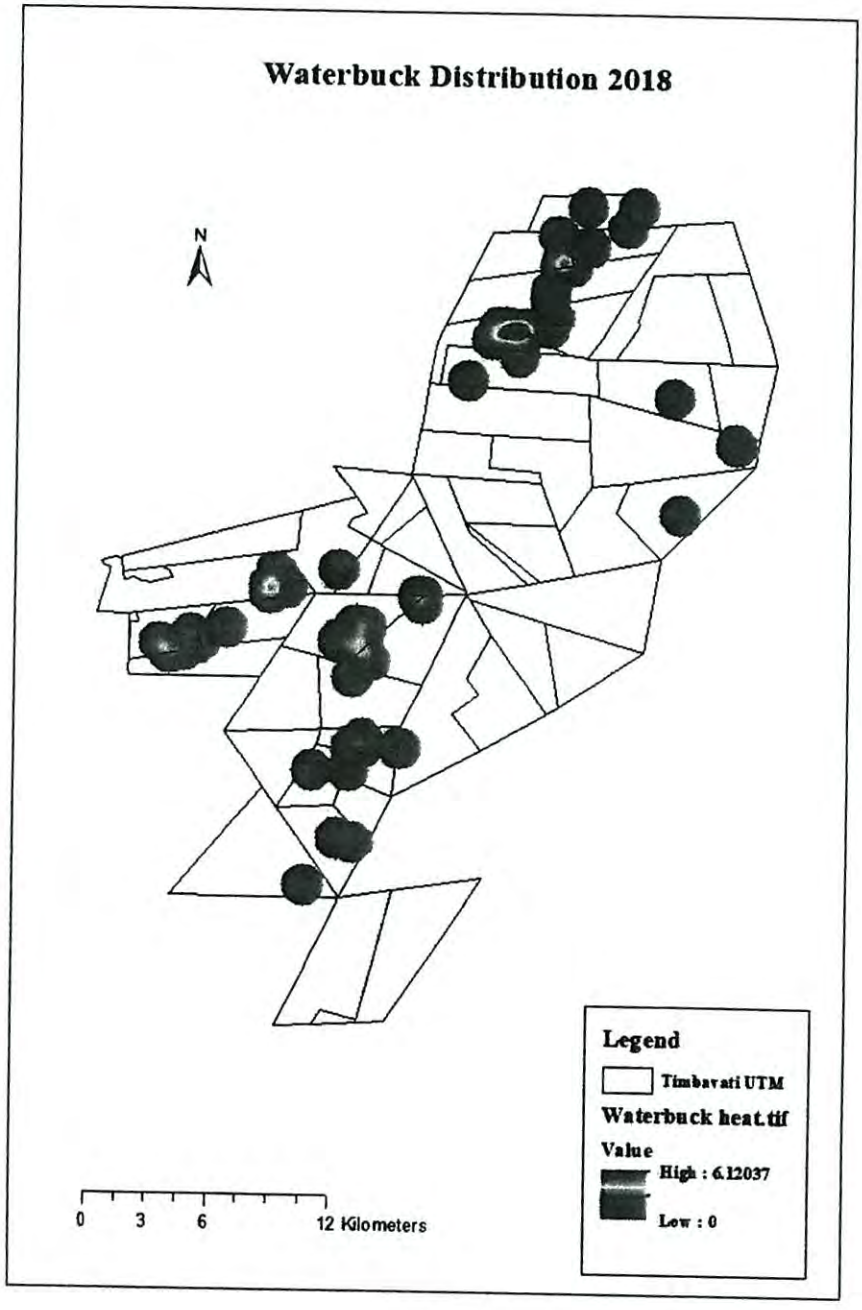
ANNEXURE 9: White Rhinoceros distribution during the 2018 aerial census.



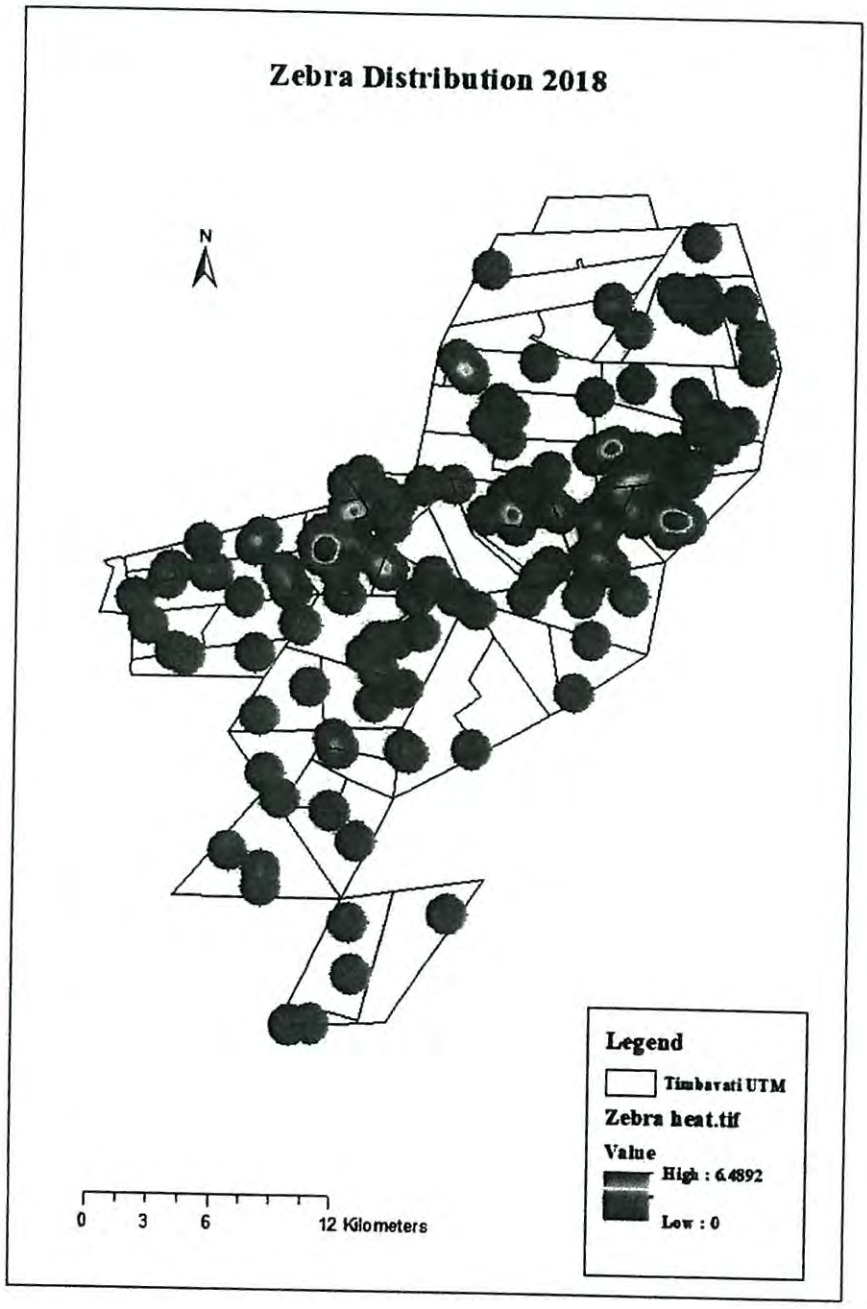
ANNEXURE 10: Warthog distribution during the 2018 aerial census.



ANNEXURE 11: Waterbuck distribution during the 2018 aerial census.



ANNEXURE 12: Burchell's zebra distribution during the 2018 aerial census.



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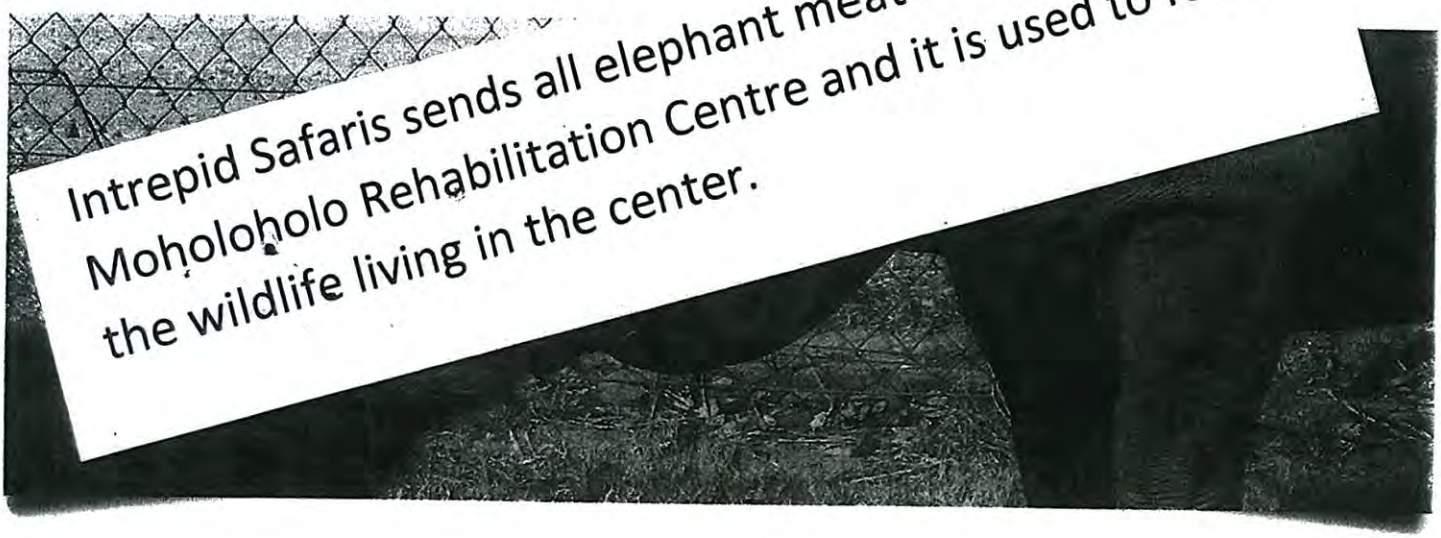

OVERVIEW

Situated in the shadow of the majestic " Mariepskop" which forms part of the mighty Drakensberg mountains, our unique Wildlife Rehabilitation Centre is a home to many of South Africa's abandoned, injured and poisoned wildlife. Moholoholo Wildlife Rehabilitation Centre is extremely proud of its efforts in wildlife education in South Africa. At Moholoholo we are often faced with the difficult decision of what to do with an injured or poisoned animal which will not be able to be released back into the wild. As a result, we have a number of "permanent residents" at the centre and at our own cost we use them as "ambassadors" for their respective species. Members of the public are therefore able to get an up close and personal experience of these incredible creatures and with our hands on approach we have the ability to demonstrate to the public the threats and problems our wildlife is facing today. The Centre has a long standing and successful Serval Breeding Project and more than 160 have successfully been reintroduced to areas where they have become extinct. We are actively involved in research on the movement

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wildlife and they are also extremely passionate in sharing their intimate knowledge. We invite you to come and share a unique experience with us.

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Two tours daily from Monday – Saturday
Approximate duration of tour is 2 – 2 ½ hours

Morning Tour starts @	09:30
Afternoon Tour starts @	15:00

Open on Sundays during school holidays and long weekends @ 15:00pm

Book Now (http://www.moholoholo.co.za/rehabilitation-center-book-now/)

Charles Bradley Peters
(b) (6)
Bakersfield, CA 93308
(b) (6)

JUN - 5 2017

Attachment to Form 3-200-52

May 30, 2017

TO: Department of the Interior
U.S. Fish and Wildlife Service

RE: Request for Amendment to Cites Permit(s) 15US64716B/9 & 14US25442B/9
Per Attached Application Form

E.2.b. Statement of why I am seeking a reissuance of
CITES Permit # # 15US64716B/9

Dear Madam or Sir:

Per the attached Permit Application Form, I am hereby applying for reissuance of the above referenced CITES Permit(s).

I was issued CITES Permit number 14US25442B/9 (01/13/2014) for my sport hunted elephant trophies taken in Tanzanian in August 2013. In October 2014 the trophy were shipped to Seattle, Washington and upon examination by U.S. Fish and Wildlife Service officials it was found that the identification numbers on the tusks had not been color-coded by Tanzanian government officials. Thus, the shipment was rejected by U.S. Fish and Wildlife Service and returned to Tanzania for color-coding. Permit number 14US25442B/9 expired on 01/12/2015.

After applying and receiving a renewal CITES Permit #15US64716B/9 on 06/01/2015, there were numerous un-explained delays with Tanzanian wildlife officials in obtaining the color-coding of the tusks. After months of delays, the identification numbers on were properly color coded and the tusks released by Tanzanian officials for shipment. At that time, the US Fish and Wildlife had imposed an import ban on ivory hunted after June 2016, and none of the international airlines serving Tanzania was accepting elephant tusks, even though I had a valid CITES permit for tusks hunted in August 2013. At this point the CITES Permit 15US64716B/9 expired on May 31, 2016.

I have been told by my Tanzanian reprehensive that he has found an international airline servicing Tanzania that now understands that the tusks obtained in 2013, can legally be transported to the United States with a valid CITES Permit. The airline has stated they will transport with the proper permits. I am therefore requesting the reissuance of CITES Permit number 15US64716B/9 to import the elephant trophy parts.

For your convenience I am attaching copies of Permit(s) 15US64716B/9 and 14US25442B/9.

Should you have any questions whatsoever, please do not hesitate to contact me at (b) (6)

Very truly,

(b) (6)

Charles Bradley Peters

CBP/
Attachments

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
15US64716B/9

2. Valid
05/31/2016

3. Permittee (name and address, country)
CHARLES BRADLEY PETERS
(b) (6)
BAKERSFIELD, CA 93312
U.S.A.

4. Consignee (name and address, country)
HSK SAFARIS CO LTD
P.O. BOX 14352
DAR ES SALAAM
TANZANIA

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(i))

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 2013 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

06/01/2015
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 ELEPHANT Scientific Name: LOXODONTA AFRICANA	9. IMPORT PERSONAL SPORT HUNTED TROPHY (shipment may contain bones, hair hide, tusk, teeth, or any taxidermined part, DOES NOT include worked, manufactued, or handicraft items such as curios, jewelry, or other utilitarian items.)	10. 1 W 11. Quantity (including units): 1 NO 12. Country of Origin: TANZANIA
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:

498632

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
14US25442B/9

2. Valid
01/12/2015

3. Permittee (name and address, country)
CHARLES BRADLEY PETERS
(b) (6)
BAKERSFIELD, CA 93314
U.S.A.

4. Consignee (name and address, country)
HILARY DAFFI SAFARIES
P.O BOX 1525
ARUSHA
TANZANIA

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. ELEPHANT MUST NOT HAVE BEEN TAKEN FROM ANY MORATORIUM AREA INCLUDING LONGIDO CONTROLLED HUNTING AREA (CHA).

TROPHY MUST HAVE BEEN TAKEN DURING 2013 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
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-3247

U.S. CITES Management Authority

01/13/2014
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 / 11. Quantity (including units) / 12. Country of Origin
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. 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: TANZANIA
B. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units): [redacted] 12. Country of Origin: [redacted]
C. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units): [redacted] 12. Country of Origin: [redacted]
D. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units): [redacted] 12. Country of Origin: [redacted]
E. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units): [redacted] 12. Country of Origin: [redacted]

492874

Department of the Interior
U.S. Fish and Wildlife Service

JUN 0 6 2017

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Peters	Charles	Bradley	Mr.

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			n/a

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
n/a	n/a

2. Tax identification no	3. Description of business, agency, Tribe, or institution
n/a	n/a

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
n/a	n/a	n/a	n/a

5. Principal officer title	6. Primary contact name
n/a	n/a

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
n/a	n/a	n/a	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Bakersfield	CA	93312	Kern	usa

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(above)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
n/a	n/a	n/a	n/a	n/a

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount 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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US64716B/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

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 15US64716B/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: (b) (6) Date: 5-30-17

   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):

C. Brad Peters (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
17US64716B/9

2. Valid
09/27/2018

3. Permittee (name and address, country)
CHARLES BRADLEY PETERS
(b) (6)
BAKERSFIELD, CA 93312
U.S.A.

4. Consignor (name and address, country)
HSK SAFARIS CO LTD.
P.O. BOX 14352
DAR ES SALAAM
TANZANIA

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 2013 HUNTING SEASON. THIS RE-ISSUES AND REPLACES 15US647168/9 ISSUED 6/1/2015.

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

-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.

09/28/2017
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: AFRICAN ELEPHANT Scientific Name: LOXODONTA AFRICANA	9. IMPORT PERSONAL SPORT HUNTED TROPHY (shipment may contain bones, hair hide, tusk, teeth, or any taxidermined part, DOES NOT include worked, manufactued, or handicraft items such as curios, jewelry, or other utilitarian items.)	10. 1 W 11. Quantity (including units) 1 NO 12. Country of Origin TANZANIA
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

726235

Charles Bradley Peters
(b) (6)
Bakersfield, CA 93312
(b) (6)

FEB 18 2019

Via Federal Express
Tracking (b) (6)

FEB 14 2019

Attachment to Form 3-200-52

February 6, 2019

US Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

703..358-2104

RE: Application for Reissuance of CITES Import Permit # 17US64716B/9

Dear Madam or Sir:

Per the attached Permit Application Form I am applying for a reissuance of the above referenced CITES Import Permit issued on 09/23/17 which expired on 09/27/18. (the original permit is attached to the application)

Permit 17US64716B/9 was my third un-successful attempt to import African Elephant trophies taken in Tanzania on August 12, 2013. The shipment was delayed for months in Arusha, Tanzania awaiting a South African Agriculture, Forestry & Fisheries Import permit (copy attached) so that the items could be transported to Johannesburg, S.A. for air transport to Seattle, WA. There were no cargo airlines servicing Tanzania that would transport elephant trophies to Seattle. South African Airlines in Johannesburg was the closest air cargo service available.

The South African import permit was applied for in March but was not issued until August 28, 2018. The actual permit did not reach the Arusha shipping facilitator until September 7, 2018, which did not leave enough time remaining on the CITES Import Permit #17US64716B/9 for transport to Johannesburg and on to Seattle, WA before the permit expired on September 27, 2018.

Should you have any questions whatsoever, please do not hesitate to contact me at (b) (6)

Very truly,

(b) (6)

Charles Bradley Peters

CBP/
Attachments (17 pages)

agriculture,
forestry & fisheries

Department:
Agriculture, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

Directorate Animal Health
Import-Export Policy Unit
Private Bag X138
Pretoria, 0001
Republic of South Africa

Tel: (27)-012-3197514
Fax: (27)-012-3298292

PERMIT NO.: 13/1/1/8/2/0-201808005366
VALID FROM: 2018-08-28
EXPIRY DATE: 2019-02-278

IMPORTER:
MR CHARLES BRADLEY PETERS
C/O SAFARI AIR CARGO SYSTEMS CC
PLOT # 34, 5th AVENUE
BREDELL
1623

2018-08-28
PRETORIA 0001

VETERINARY IMPORT PERMIT / INTRANSIT PERMIT FOR THE IMPORTATION OF TROPHIES INTO SOUTH AFRICA
[Issued in terms of the Animal Diseases Act, 1984 (Act 35 of 1984)]

You are hereby authorised to import the following trophies **SEE THE ATTACHED LIST, SIGNED AND STAMPED BY THE OFFICIAL WHO SIGNED THE PERMIT** from **TANZANIA** (Country) by **AIR** into the Republic of South Africa, subject to compliance with the following conditions:

1. The importer, above, accepts the sole responsibility to ensure that the conditions below, are complied with and understands his/her duty in this regard.

2. The consignment must be accompanied by:
   2.1 This original permit;
   2.2 The original health certificate TROPHIES. HC.COMM.08/05.RB.REV.JR.09/2011 (consisting of 2 pages), completed in English and signed by an official veterinarian, employed by the Veterinary Authority of the country of origin

3. The trophies are consigned in an officially sealed container that is leak proof.

4. Consignments imported by air for immediate re-export from OR Tambo International need not comply with the above mentioned health certificate.

5. The product described above may only be imported through the port of entry of O R TAMBO INTERNATIONAL

6. The arrival of the consignment must timeously be reported at the port of entry to the State Veterinarian, veterinary official or Agricultural Officer at **O R TAMBO INTERNATIONAL** Tel 011 973 2827 Fax: **011 973 2828**, and may not be landed without his/her written permission.

7. The trophies will be then be consigned under red-cross movement permit for further processing to N/A Taxidermy.

8. The State Veterinarian **N/A** Tel. No: **N/A** Fax. No **N/A** must be advised timeously of the date of despatch and intended date of arrival of the consignment at **N/A** (a R.S.A. import approved taxidermy), who will inspect and release the consignment, if found satisfactory.

   OR for intransit consignments the date of dispatch and intended date of arrival of the consignment at O R TAMBO INTERNATIONAL
   is to be reported timeously by the importer to the State Veterinarian or Veterinary Official: KEMPTON PARK Tel: 011 973 2827 Fax:011 973 2828, who will inspect the consignment and documentation before export to USA.

9. After unloading, the consignment must be stored in a lockable quarantine store and processed to the satisfaction of the State veterinarian concerned.

10. Any discarded raw pieces must be boiled for at least ten minutes before further disposal, or be destroyed by burning.

11. The railway trucks, road containers and the site on which the unloading takes place must be washed and disinfected to the satisfaction of the State Veterinarian concerned.

12. This permit is valid for 6 months from date of issue and for ONE CONSIGNMENT ONLY.

13. This permit is subject to amendment or cancellation by the Director Animal Health at any time and without prior notice being given.

NOTE: All relevant CITES regulations and import permit requirements must be complied with.

DIRECTOR: ANIMAL HEALTH

Note:

a) This authorisation does not absolve the importer from obtaining permission for the importation of this product, which might be required by any other South African legislation.
b) Any consignment imported into South Africa packed with either wood packing material or dunnage, will require treatment to remove any pests present (by heat or methyl bromide fumigation). Treatment must be indicated on packing material. [Enquiries: Directorate Inspection Services Fax: 012 309 8701 or www.daff.gov.za]

B. HEALTH ATTESTATION

I, _____, the undersigned veterinarian, authorised thereto by the Veterinary Authority of the country of origin, certify that the product described in section A:

1. All trophies were sourced in the exporting country.
2. Hides and skins of all species have been dry or wet salted with sea salt containing 2% washing soda (sodium carbonate) for a minimum of 28 days prior to dispatch. In the case of warthog trophies, the skins were treated with an appropriate acaracide to ensure that no parasites are present on the trophy.
3. Skulls, bone, hooves, claws, teeth and horns of all species (where applicable) were boiled in water for an appropriate time under official veterinary supervision to ensure that any matter other than bone, horns, hooves, claws, antlers or teeth is removed and were disinfected with a product authorized by the veterinary authority. Where bone is present, that must be disinfected with hydrogen peroxide, or soaked in 4% formalin or 5% washing soda, for 48 hours under official veterinary supervision.
4. The trophies originate from an area in which anthrax is not prevalent.

   OR

   The trophies have been disinfected by fumigation with ethylene oxide 500 mg/m³ at relative humidity 20-40% at 55°C for 30 minutes, or fumigation with formaldehyde 400 mg/m³ at relative humidity 30 %, at 15°C for 4 hours, or gamma irradiation with a dose of 40 kiloGray.
5. The trophies have not been exposed to contamination after treatment.
6. The trophies have been individually wrapped in transparent packaging.
7. Was sealed under official supervision: seal no's: .....
8. Was transported in clean vehicles/containers, with container/vehicle/trailer registration number:.....

Signed at ..... on date .....

_____

Authorised Veterinarian

Name in print: .....

Designated rank: .....

Address: .....

.....

.....

Official stamp

VETERINARY HEALTH CERTIFICATE FOR THE IMPORTATION OF TROPHIES INTO SOUTH AFRICA

ISSUING AUTHORITY: **REF NO.:** .....

COUNTRY OF ORIGIN: (consecutive serial no.)

A. DESCRIPTION

1. Amount and description of product.

MASS	DESCRIPTION*	NO. OF PIECES	PACKAGING

**= Nature of product i.e. raw, salted kudu skins.*

2. Origin of product(s)

2.1. Name and address of exporter: .....

.....

Tel. no.: ..... Fax. No.: .....

2.2. Physical address of premises of origin: .....

.....

3. Destination of product

3.1. Name and address of consignee: .....

.....

Tel. no.: ..... Fax. No.: .....

3.2. Physical address at final destination: .....

.....

3.3. Means of transportation (air/rail/road): .....

Name of Commercial Carrier: .....

4. South African Import Permit Number : .....

B. HEALTH ATTESTATION

I, _____, the undersigned veterinarian, authorised thereto by the Veterinary Authority of the country of origin, certify that the product described in section A:

1. All trophies were sourced in the exporting country.
2. Hides and skins of all species have been dry or wet salted with sea salt containing 2% washing soda (sodium carbonate) for a minimum of 28 days prior to dispatch. In the case of warthog trophies, the skins were treated with an appropriate acaracide to ensure that no parasites are present on the trophy.
3. Skulls, bone, hooves, claws, teeth and horns of all species (where applicable) were boiled in water for an appropriate time under official veterinary supervision to ensure that any matter other than bone, horns, hooves, claws, antlers or teeth is removed and were disinfected with a product authorized by the veterinary authority. Where bone is present, that must be disinfected with hydrogen peroxide, **or** soaked in 4% formalin or 5% washing soda, for 48 hours under official veterinary supervision.
4. The trophies originate from an area in which anthrax is not prevalent.

   OR

   The trophies have been disinfected by fumigation with ethylene oxide 500 mg/m³ at relative humidity 20-40% at 55°C for 30 minutes, or fumigation with formaldehyde 400 mg/m³ at relative humidity 30 %, at 15°C for 4 hours, or gamma irradiation with a dose of 40 kiloGray.
5. The trophies have not been exposed to contamination after treatment.
6. The trophies have been individually wrapped in transparent packaging.
7. Was sealed under official supervision: seal no's: .....
8. Was transported in clean vehicles/containers, with container/vehicle/trailer registration number:.....

Signed at ..... on date .....

_____

Authorised Veterinarian

Name in print: .....

Designated rank: .....

Address: .....

.....

.....

Official stamp

IB BRAND 0001982 CENTRE CODE
Swift Code SBZA-ZAJJ

QUANTITY (1x, 2x etc)	ANIMAL SPECIES (eg : Springbuck / Gemsbuck etc)	DESCRIPTION (mask, skin etc.)
TWO (2)	AFRICAN ELEPHANT	TUSKS
TWO (2)	AFRICAN ELEPHANT	FEET
ONE (1)	AFRICAN ELEPHANT	BACK SKIN
ONE (1)	AFRICAN ELEPHANT	EAR SKIN

VETERINARY PERMIT NO:
2018080053356

SIGNATURE:

DIRECTORATE: ANIMAL HEALTH
PRIVATE BAG X138
2018 -08- 28
PRETORIA 0001
FORESTRY AND FISHERIES

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
17US64716B/9

2. Valid
09/27/2018

3. Permittee (name and address, country)
CHARLES BRADLEY PETERS
(b) (6)
BAKERSFIELD, CA 93312
U.S.A.

4. Consignor (name and address, country)
HSK SAFARIS CO LTD.
P.O. BOX 14352
DAR ES SALAAM
TANZANIA

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.

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TROPHY MUST HAVE BEEN TAKEN DURING 2013 HUNTING SEASON. THIS RE-ISSUES AND REPLACES 15US64716B/9 ISSUED 6/1/2015.

5a. Purpose of Transaction
H

Original, Unused Permit Returned

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

-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.

09/28/2017
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
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B. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
C. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
D. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
E. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]

726235

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Peters	Charles	Bradley	Mr.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
n/a	n/a

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
n/a	n/a

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
n/a	n/a	n/a	n/a

5. Principal officer title	6. Primary contact name
n/a	n/a

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
n/a	n/a	n/a	n/a

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Bakersfield	CA	93312	Kern	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
same as above

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 2-11-19

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

   same as in Section C

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
   C. Bradley Peters ..(b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

   n/a

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: 17US64716B/9

5. Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification -** Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

      I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

      Permittee's signature: (b) (6) Date: 2-11-19

   b. For **CHANGES** to original application:

      On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

      I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

      Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

Charles Bradley Peters

(b) (6)

August 8, 2019

US Fish and Wildlife Service 703..358-2104
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: February 6, 2019 Application for Reissuance of CITES Import Permit # 17US64716B/9

Dear Madam or Sir:

On February 6, 2019 I sent in a permit application for the reissue of the above referenced CITES permit. Since that time I have had no communication or issuance of a permit from your office regarding this application.

Would you please contact me with an up-date of the status of this application. The time on my Tanzanian export permits is running.

Should you have any questions whatsoever, please do not hesitate to contact me at (b) (6)

Very truly,

(b) (6)

Charles Bradley Peters

CBP/

Brisendine, Amy <amy_brisendine@fws.gov>

Status of application 64716B (Import of African elephant trophy from Tanzania)

1 message

Brisendine, Amy <amy_brisendine@fws.gov> Tue, Sep 24, 2019 at 10:10 AM
To: (b) (6)
Cc: Amy Brisendine <amy_brisendine@fws.gov>

Hi Mr. Peters,

This is in reference to your letter dated August 8, 2019 to our office. Your application is still pending. I apologize for the delay.

Please feel free to contact me if you have any other questions.

Best regards,

Amy Brisendine
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D
Falls Church, Virginia 22041
703-358-2005 direct
https://www.fws.gov/international/permits/
https://www.cites.org

Form 3-200-20

OMB Control No 1018-0093
Expires 08/31/2020

LP

RCVD FEB 28 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c Middle Name/Initial	1.d Suffix
WILLIS	RONALD	CRAIG	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
HICO	TEXAS	76457	HAMILTON	U.S.A.

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

atty in fact 02/19/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   PRO CARGO USA 15619 MORALES ROAD HOUSTON,TEXAS 77032 CINDI RULON SELF ADDRESSED ENVELOPE ENCLOSED

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   CINDI RULON CINDI.RULON@PROCARGOUSA 281-220-3176

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

LOXODANTA 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 information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

DUNDE KLIPHEWNEL, BALULE PRIVATE GAME RESERVE, HOEDSPRUIT, 1380 LIMPOPO SOUTH AFRICA

b. Date wildlife was hunted:

AUGUST 13, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

PROFESSIONAL HUNTER JAPIE 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 foreign export/re-export document]:

TROPHY SOLUTIONS
11 SIXTH AVENUE, INDUSTRIA POLOKWANE 0699, SOUTH AFRICA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). ATTACHED

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	TROPHY SOLUTIONS
Address:	PO BOX 12043
City:	BENDOR PARK
State/Province:	POLOKWANE
Country, Postal Code:	SOUTH AFRICA

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

IT IS OUR UNDERSTANDING THAT WILDLIFE POPULATION STUDIES ARE ALREADY ON FILE WITH THE USFWS OFFICE AND THAT THESE STUDIES SHOW STABILITY AND GROWTH IN ELEPHANT POPULATIONS

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

I PAID 35,000 IN TROPHY FEES FOR THIS HUNT. A PORTION OF THESE FEES GO TOWARD ANTI-POACHING PATROLS IN THE PARK RESERVE WHERE I HUNTED AND TO THE GAME SCOUTS IN THE WILDLIFE DEPARTMENT.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

A MAJORITY OF THE ELEPHANT MEET GOES TO THE LOCAL VILLAGE NEAR WHERE I HUNTED. THE REMAINING PARTS OF THE CARCASS GOES TO THE LION AND LEOPARD REHABILITATION CENTER

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: 02/19/19

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

G.P.-S.

ORDINARY PERMIT

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

DEPARTMENT: ENVIRONMENTAL AFFAIRS AND TOURISM

PERMIT NUMBERED: NO. 06787

KLASERIE SERVICE CENTRE
NAME P.O. BOX 1408
ADDRESS HOEDSPRUIT
1380
PROVINCE LIMPOPO PROVINCE
NORTHERN DISTRICT

(b) (6)

DETAILS OF PERMIT HOLDER

NAME	C.R.	ID NO.	–
SURNAME	Willis	PASSPORT NO.	(b) (6)
	POSTAL ADDRESS	RESIDENTIAL ADDRESS	
ADDRESS		(b) (6)	
ADDRESS			
ADDRESS		–	
TOWN		Tampa	
POSTAL CODE		75/57	
PROVINCE		USA	

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	L.E.J. Lodge
NAME AND SURNAME: RESPONSIBLE PERSON	L.E.J. Lodge
NAME AND SURNAME OF AGENT	–
PHYSICAL ADDRESS OF FACILITY	Duiwelskloof, Wyfiesvlei, Klaserie - Balule
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	Nelspruit
PROVINCE	Limpopo
REGISTERED NAME AND NUMBER (in the case of game farm)	

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
Elephant	L. africana	male	one	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

Hunt one elephant bull in Balule.

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)	C.R. Willis
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	W. Hern
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	Hlulo Hunting Safaris
WEAPON AND METHOD OF HUNTING	rifle

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: 07/08/2018	TO:	07/09/2018
RECEIPT NUMBER	EC1225384		

DEPARTMENT: ENVIRONMENTAL AFFAIRS
KLASERIE SERVICE CENTRE

(b) (6)

SIGNATURE OF ISSUING OFFICER:

SIGNATURE OF PERMIT HOLDER:

DATE STAMP: 07 AUG 2018

P.O. BOX 1408 HOEDSPRUIT 1380
TEL: 015 793 2471 FAX: 086 763 7672

LIMPOPO PROVINCE

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 47814

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 03 / 08 / 2018 Terminated 13 / 08 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
			✓					

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: Japie Horn

Business Address: P.O. Box 535

Louis Trichardt

Code: 0920

ID No: 7406175212085

PH Permit No: ZALP 7109 14

Date: 13/08/2018 Signature: J HORN

CLIENT

Name: [redacted]

Permanent Postal Address: [redacted]

Hilo, Texas Code: 76457

Country: USA Tel/Fax:

Passport No: [redacted]

Email:

Date: 13/08/2018 Signature: [redacted]

HUNTING OUTFITTER

Name: Japie Horn

Business Address: 891 Plant St.

Louis Trichardt Code: 0920

I.D. No: 7406175212085

[illegible] No: 0845223112 Fax No:

[illegible]O Permit No: ZALP 3183

[illegible]: 13/08/2018 Signature: J HORN

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
Dumate 32 FH	Mopani	LFJ Kotze	06787	11/08/18	Elephant	1		X	Tusks, Skull, Trunk, 3 panel of skin
Elephant 32 FH		Struwigsrus 4HK							
Lisbon 32 FH		Bakule Private							
		Game Reserve							
		Hoedspruit							
		1380							

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 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: 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.

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

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.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b) (6)

Cell Phone (b) (6)

Email address: (b) (6)

x Individual

KNOW ALL MEN BY THESE PRESENTS: That, x Ronald Craig Willis (Full Name of Person), residing at x (b) (6) Hico, TX 76457 hereby constitutes and appoints each of the following persons - John Rulon CHB

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, steed of said grantor, from this date and in all Customs Districts, and in no other name, to make, endorse, sign, declare, answear 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 merchandize 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 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 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 111.96(a), election is made waiving the right to receive invoices, supporting documents and correspondences from John Rulon CHB, who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

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

IN WITNESS WHERE OF, the said (Print name) x Craig Willis

has caused the (b) (6)

(Signature) x

((Date) x 8-20-2018

Form 3-200-19

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 04 2019

LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES 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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
BOYD	RONALD	A	
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
MANSFIELD	TEXAS	76063	TARRANT	U.S.A
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer (for permit (b) (6) photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 02/22/2019

Please continue to next page

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. 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): Elephant (Loxodonta Africana) Qty 1

   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).

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:

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 signatu (b) (6) Date: 02/22/2019

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.

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).**

EZEMVELO
KZN WILDLIFE

ORIGINAL

ORDINARY PERMIT

Fee: R 1 100,00
Receipt No: 2775/2017

Permit No: OP 2802/2017
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: 491007425

Mr Ronald Adrian Boyd
"KwaZulu Private Game Reseve"
P.O.Box 591
Pongola
3170

Residential Address
"KwaZulu Private Game Reseve"
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:
Mr R.A Boyd

(b) (6)
Mansfield
Texas 76063
United States of America

Hunting Outfitter:
Mr E Alberts

Northern Zululand Safaris PH 084 : 8536

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 11 Jul 2017

for CHIEF EXECUTIVE

(b) (6)

Permit Holder

ORIGINAL

EZEMVELO
KZN WILDLIFE

Professional Hunter:
Mr E Alberts

Northern Zululand Safaris PH 084 [illegible] 6536

Weapon: Rifle

Hunting Method: Walk & stalk

TERMS AND CONDITIONS UNDER WHICH THIS PERMIT IS ISSUED

1. It is valid only:
   (i) from : 11 Jul 2017
   to : 15 Sep 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.

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 11 Jul 2017

(b) (6)

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 Website: www.kznwildlife.com

EZEMVELO
KZN WILDLIFE

ORIGINAL

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.

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 upon expiry. Failure to comply with this condition may jeopardise the issue of future permits.

20 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 11 Jul 2017

(b) (6)

for CHIEF EXECUTIVE

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: 088 529 3320
Email: permits@kznwildlife.com Website: www.kznwildlife.com

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 48737

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 29 / 08 / 2017 Terminated 03 / 09 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
✓								

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: E. P. Alberts

Business Address: 20 Booysen St

Nelspruit

Code: 0510

ID No: 8007085005087

PH Permit No: 934/2017

Date: 03/09/2017 Signature:

CLIENT

Name: RONALD A BOYD

Permanent Postal Address: (9)

MANSFIELD TX Code: 76063

Country: USA Tel/Fax:

Passport No: (9)

Email:

Date: 03/09/2017 Sig (9) (9)

HUNTING OUTFITTER

Name: E. P. Alberts

Business Address: 20 Booysen Str

Nelspruit Code: 0570

I.D. No: 8007085005087

Tel No: 079869 3360 Fax No:

HO Permit No: 936/2017

Date: 03/09/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
K.P.G.K.	Nkuanda	J. M. Buellhorst	4269/2016	30/08	Elephant	1		X	2 Tusks / 7 x Panels
				01/09	Mountain Reedbuck	1		X	Skull + Cape

Address to which trophies are to be sent:

Code: Country: Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies: Client — Original White; 1st Copy Pink — Forward to Nature Conservation Authority where hunt took place

Hunting Outfitter — 2nd Copy Blue — Retain for a period of three years

Taxidermist — 3rd Copy Green — Taxidermist

Professional Hunter — Last Copy Yellow — Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more.

18 February 2019

To whom it may concern

Dear Sir / Madam

9 a) According to our surveys there were 28,168 elephants in South Africa as of December 2015. The status of African elephant, Loxodonta Africana populations in South Africa Yolanda Pretorius, Marion E. Garai and Lucy A.
Bates https://doi.org/10.1017/S0030605317001454 Published online: 15 April 2018.

b) The income generated is utilised for the management of the reserve's elephant population, such as contraception of females due to the high population density in the park. Protecting both elephant and rhino populations in private reserves has become very costly and therefore requires substantial financial investment and income from sustainable use contributes to the protection and maintenance of these populations. In addition to wildlife management, habitat management is also very costly and elephant impact on woody plants must be assessed as part of the overall management to guide decision making and again is hugely costly. Funds from sustainable use are critical part of the financial sustainability of these private reserves and ensure they persist.

c) Kwazulu Private Game Reserve has an approved Elephant Management Plan in place and the elephant population is managed in accordance with this plan.
We have +/- 70 local members of the communities around us in the employment of Kwazulu Private Game Reserve. This has a positive influence on the security of the park, as they assist with the anti-poaching on our property. We supply meat to the primary school neighbouring our farm, to feed +/- 100 pupils. We supply water to the school and to 2 of the communities neighbouring our farm. We assist the communities with ploughing their fields, supplying firewood and river sand on a weekly basis. We make donation\s towards local sports teams as well as functions within the communities. Some of our guests make donations to the local communities (sports teams and school). We are a member of the Black Rhino Range Expansion Project (BRREP) and we work hand in hand with Project Rhino to protect our rhino population.

Yours truly,

p/o .....
Kwazulu Private Game Reserve

KWAZULU PRIVATE GAME RESERVE (PTY) LTD. – P.O. BOX 591 PONGOLA 3170
VAT NO: 4030205217 / COMPANY REGISTRATION NO: 2001/018212/07
TEL: 034 414 1085 / CELL: 083 845 5537 / FAX: 034 414 1389 / EMAIL: kwazulugame@gmail.com
DIRECTOR: JM QUELLHORST

Form 3-200-19

OMB Control No 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES 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		1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
SWICK		DOUGLAS	WAYNE	
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address	
(b) (6)				

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ARGYLE	TEXAS	76226		USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
(b) (6)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
FORT WORTH	TEXAS	76140		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)

(b) (6) 02/20/2019

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. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. 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):

ELEPHANT (LOXODONTA AFRICANA) QUANTITY

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).

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:
   KWAZULU PRIVATE GAME RESERVE, PONGOLA, KWA ZULU N

   e. Date wildlife was hunted: AUGUST 31, 2017

   f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   EUGENE ALBERTS, HIGH FIVE 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, 7 ALUMINIUM ROAD,
   WHITE RIVER, 1240, MPUMALANGA, 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.

   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: 02/20/2019

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.

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).**

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 48738

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 29 / 08 / 2017 Terminated 03 / 09 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
✓								

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: E. P. Alberts

Business Address: 20 Booyson St

Bloemfontein

Code: 0510

ID No: 800708 5005 087

PH Permit No: 934/2017

Date: 03/09/2017 Signature:

CLIENT

Name: DOUGLAS WAYNE SWICK

Permanent Postal Address: (6) (6)

ARGYLE TX USA Code: 76226

Country: USA (6) (6)

Passport No: (6) (6)

Email: (6) (6)

Date: 03/09/2017 Signature: (6) (6)

HUNTING OUTFITTER

Name: E. P. Alberts

Business Address: 20 Booyson St

Bloemfontein Code: 0510

I.D. No: 800708 5005 087

Tel No: 079 969 3369 Fax No:

HO Permit No: 936/2017

Date: 03/09/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
K.P.R.G.	Magisterial	J.H. Gullhorst	4269/2016	31/08	Elephant	1		X	2x Tusks / 7 x Pallets
				01/09	Common Duiker	1		X	Skull + Full Mount Skin
				03/09	Nyala	1		X	Skull + Horns + Cape + B-S

Address to which trophies are to be sent:

Code: Country: Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies:			
Client	Original	White	
	1st Copy	Pink	Forward to Nature Conservation Authority where hunt took place
Hunting Outfitter	2nd Copy	Blue	Retain for a period of three years
Taxidermist	3rd Copy	Green	Taxidermist
Professional Hunter	Last Copy	Yellow	Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more.

18 February 2019

To whom it may concern

Dear Sir / Madam

9 a) According to our surveys there were 28,168 elephants in South Africa as of December 2015. The status of African elephant, Loxodonta Africana populations in South Africa Yolanda Pretorius, Marion E. Garai and Lucy A.
Bates https://doi.org/10.1017/S0030605317001454 Published online: 15 April 2018.

b) The income generated is utilised for the management of the reserve's elephant population, such as contraception of females due to the high population density in the park. Protecting both elephant and rhino populations in private reserves has become very costly and therefore requires substantial financial investment and income from sustainable use contributes to the protection and maintenance of these populations. In addition to wildlife management, habitat management is also very costly and elephant impact on woody plants must be assessed as part of the overall management to guide decision making and again is hugely costly. Funds from sustainable use are critical part of the financial sustainability of these private reserves and ensure they persist.

c) Kwazulu Private Game Reserve has an approved Elephant Management Plan in place and the elephant population is managed in accordance with this plan.
We have +/- 70 local members of the communities around us in the employment of Kwazulu Private Game Reserve. This has a positive influence on the security of the park, as they assist with the anti-poaching on our property. We supply meat to the primary school neighbouring our farm, to feed +/- 100 pupils. We supply water to the school and to 2 of the communities neighbouring our farm. We assist the communities with ploughing their fields, supplying firewood and river sand on a weekly basis. We make donation\s towards local sports teams as well as functions within the communities. Some of our guests make donations to the local communities (sports teams and school). We are a member of the Black Rhino Range Expansion Project (BRREP) and we work hand in hand with Project Rhino to protect our rhino population.

Yours truly,

p/o .....
Kwazulu Private Game Reserve

KWAZULU PRIVATE GAME RESERVE (PTY) LTD. – P.O. BOX 591 PONGOLA 3170
VAT NO: 4030205217 / COMPANY REGISTRATION NO: 2001/018212/07
TEL: 034 414 1085 / CELL: 083 845 5537 / FAX: 034 414 1389 / EMAIL: kwazulugame@gmail.com
DIRECTOR: JM QUELLHORST

EZEMVELO
KZN WILDLIFE

ORIGINAL

ORDINARY PERMIT

Fee: R 1 100,00
Receipt No. 2798/2017

Permit No: OP 2801/2017
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)

Mr Douglas Wayne Swick
(b) (6)
Argyle
Texas International
762267

Residential Address
(b) (6)

In the capacity of Hunting Client
To Hunt and Temporary Possess the following species of Game

AFRICAN ELEPHANT (*LOXODONTA AFRICANA*)
1 (One)

Hunting Client:
Mr D Swick
"KwaZulu Private Game Reserve"
P.O.Box 591
Pongola
3170

Hunting Outfitter:
Mr E Alberts
Northern Zululand Safaris PH 084 2
8536

Professional Hunter:
Mr E Alberts
Northern Zululand Safaris PH 084 2
8536

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 11 July 2017

for CHIEF EXECUTIVE

(b) (6)

Permit Holder

EZEMVELO KZN WILDLIFE

ORIGINAL

TERMS AND CONDITIONS UNDER WHICH THIS PERMIT IS ISSUED

1. It is valid only:
   (i) from : 10 August 2017
   to : 15 September 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. The prescribed fee payable for the issuing of this permit shall not be refunded.
11. If the holder of this permit contravenes or fails to comply with any condition or requirement to which this permit is subject, he or she shall be guilty of an offence.
12. This permit shall be subject to any applicable norms and standards in existence at the time of issuance of this permit.
13. The issuing authority shall determine the species and restricted activities for which this permit will apply

Please read the Terms and Conditions under which this Permit is issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 11 July 2017

for CHIEF EXECUTIVE

(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

EZEMVELO KZN WILDLIFE

ORIGINAL

14 If this permit applies to hunting, the holder of this permit must: a. Have a copy of this permit authorising the hunt, on his or her person during the hunt: b. Within 21 days after the hunt, furnish the issuing authority with a written return on the hunt stating: i) the permit number and date of issuance of the permit ii) the species, sex and number of animals hunted; and iii) the location where the hunt took place.

15 Return the original permit to the issuing authority forthwith after expiry of the permit.

16 To be completed by the landowner after completion of the hunt: Name and signature of the landowner... Species, number and sex of the animals hunted

17 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 upon expiry. Failure to comply with this condition may jeopardise the issue of future permits.

20 This permit is issued to the client named above and does not entitle the Professional Hunter and/or the Hunting Outfitter to hunt the species listed herein with another client, either on the property stipulated on the permit, or any other, should the hunt not be successful.

Please read the Terms and Conditions under which this Permit is Issued

ISSUED at PIETERMARITZBURG, KwaZulu-Natal, on 11 July 2017

for CHIEF EXECUTIVE

(b) (6) [redacted]

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

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 12 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Spaetti	Charles	A.	n/a

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
Not applicable	
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Evansville	Indiana	47711	Vanderburgh	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
same as above

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach 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
(b) (6) [redacted]
formation submitted in this application for a permit is complete and
rein may subject me to the criminal penalties of 18 U.S.C. 1001.

03/04/2019

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   same as Section A, page 1

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Charles A. Spaetti
   Phone: (b) (6)
   Email: [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?

[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. 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:

      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-Kwandu Conservancy.
      The nearest city was Katima Mulilo.

   b. Date wildlife was hunted:

      The elephant was hunted and taken on August 27, 2018.

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Emile Kirchner
Jamy Traut Hunting Safaris CC

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

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].

Shipper:

Name: The Yellow Shark Holdings (Pty.) Ltd
Business Name: (same as above)
Address: P.O. Box 81413
City: Olympia/Windhoek
State/Province:
Country, Postal Code: Namibia

Professional Hunter:

Emile Kirchner
Jamy Traut Hunting Safaris CC
P.O. Box 4890
Rehoboth
Namibia, Africa

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

No

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

I paid a $100 license fee, an $850 conservancy fee and a $24,000 elephant trophy fee. It is my understanding that those fees were used by the government. Those fees were in addition to my outfitter's charges.

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 the attached statement on conservation and sustainability from the outfitter's website.

Section E, question 7

MINISTRY OF ENVIRONMENT AND TOURISM			
Directorate Scientific Services Private Bag 13306 Windhoek, Namibia Enquiries: Permit Office Tel +264-61-284 2538/2506	PERMIT No.:		182227
	VALID FROM:		19.08.18
	VALID TO:		31.08.18
	RECEIPT No.:		5762477

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: C.A. Spretti

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok		Impala Common mayu	1X	Springbok		Other	
Buffalo		Klipspringer		Steenbok		Baboon mayu	1X
Crocodile		Kudu Kwandaby	1X	Warthog		Report with photos after hunt. Actual meat to be given with Reg 16 3(2) (copy of permit(s) Copy of PHOTOS enclosed	
Dik-Dik		Lechwe mayu	1X	Waterbuck			
Eland Mayu	1X	Oryx (Gemsbok)		Wildebeest, Black			
Elephant Kwandmayu	1X	Ostrich		Wildebeest, Blue			
Giraffe		Reedbuck Kwandumayu	1X	Zebra Burchell's			
Grey Duiker Mayu	1X	Rhinoceros, Black		Zebra Hartmann's			
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus Kwandmayu	1X	Roan Kwandu	1X	Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: Kwandu + Mayuni Conservancy

Guided by (name of guides): E. Kirchner & J. Trout

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way

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 hu Master hunting Hunting guide
27/8/13	Elephant							⑥	♂	Kwandwe		[redacted]	(b) (6)	

*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.

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 06436

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant: C.A SPAETTI

2. Identity No. / Passport No.:

3. Residential address: C.S.A

Tel No.:

4. Postal address:

5. From where are products obtained: KWANDU AND MAYUNI CONSERVANCY

6. The following documents are attached as proof of ownership:

(a) PERMIT NO 183227

(b)

(c)

(d)

(e)

MINISTRY OF ENVIRONMENT AND TOURISM
Katima Mulilo
2018 -11- 02
Tel: 066 - 262300
Fax: 066 - 253341
Private Bag 1020, Katima Mulilo

SIGNATURE OF APPLICANT

02/11/18
DATE

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
06436	ELEPHANT							85
	TUSK 1	114	134	37	33·8	52	5·5	NA 18 0031 10·85
	TUSK 2	112	131	36·5	33·5	47	5·5	NA 18 0032 10·30

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REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 06429

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant: C.A SPAETTI

2. Identity No. / Passport No.:

3. Residential address: U.S.A

Tel No.: .....

4. Postal addr [redacted] (b) (6)

SIGNATURE OF APPLICANT

5. From where are products obtained: KWANDU CONSERVANCY

6. The following documents are attached as proof of ownership:

(a) PERMIT NO 182227

(b) .....

(c) .....

(d) .....

(e)

MINISTRY OF ENVIRONMENT AND TOURISM
Katima Mulilo
2018 -10- 22
Tel 066 - 262300
Fax 066 - 253341
Private Bag 1020, Katima Mulilo

22/10/18

DATE

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
06429	ELEPHANT	2X TUSKS						
		1X SKIN PANEL						
		2X EARS						
		1X TRUNK						
		1X TAIL						

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Republic of Namibia

MINISTRY OF AGRICULTURE, WATER AND FORESTRY

5c

Telephone +264-61-61-276 592
Fax. +264-61-303 151

DIRECTORATE OF VETERINARY SERVICES
Private Bag 12022
Windhoek
NAMIBIA

Permit no: TR46/2018

Data of Issue. 18 OCTOBER 2018

Expiry Date 18 JANUARY 2019

VETERINARY PERMIT FOR HIDES/ SKINS/TROPHIES INFECTIOUS THINGS FROM ANIMALS SUSCEPTIBLE TO FOOT AND MOUTH DISEASE ORIGINATING FROM AREAS NORTH OF THE VETERINARY CORDON FENCE

(Issued in terms of the Animal Act, no 1 for 2011)

Authority is hereby granted to.

Name: JAMY TRAUT HUNTING SAFARIS

Address: P. O. BOX 35576 WINDHOEK, NAMIBIA

Telephone: 081 737 6501

to move south of the veterinary cordon fence the following:

SPECIES	SKULL	PIECE UPPER JAW TUSK	TUSK	TRUNK	CAPE	EAR	SKIN PANEL	TAIL	BACK SKIN	SKULL & HORN	FEET	FLAT SKIN	LOWER JAW TUSK	UPPER JAW TUSK	FULL MOUNT
BUFFALO					2				1	2					
LECHWE					2				1	2					
REEDBUCK					1				1	1					
ZEBRA												2			
IMPALA					1					1					
ELAND					1				1						
ELEPHANT			2	3		6	1	3							
CROCODILE	2											2			
HIPPO		4					1	1			2		3	3	
LION	1														1

From ZAMBEZI EAST BIG GAME CC - ZAMBEZI REGION (quarantine facility)

To KINGS TAXIDERMY, 27 BAHNHOFF STREET, OTJIWARONGO (Address of approved tannery)

Subject to the following conditions:

1. The applicant accepts the sole responsibility of ensuring that the conditions below have been complied with, and understands his/her duty in this regard.
2. The hides/ hides skins infectious things must be accompanied by this ORIGINAL PERMIT.
3. The hides and skins/infectious things must be loaded into previously approved airtight containers and SEALED under veterinary supervision.
4. The consignment should be presented to the State Veterinarian KATIMA-MULILO telephone 066-243142 in sealed containers. The state veterinarian KATIMA-MULILO must break the seals and inspect the trophies, hides& skin to verify that the products were quarantined north of the veterinary cordon fence and were subjected to one of the following treatment before granting permission to move south of the veterinary cordon fence.

5. a) Hide and skins:* wet-salted in sea salt with addition of 2% washing soda (Na_2CO_3) for at least 30 days before dispatch OR * sprayed with 5% washing soda (Na_2CO_3) followed by official quarantine for 30 days before dispatch OR *sprayed with 5% formalin followed by official quarantine for 30 days before dispatch.

b) Trophies consisting solely of horns, bones, hooves, claws, antlers and teeth must:

(i) Be immersed in boiling water for an appropriate time so as to ensure that any matter other than horn bone and teeth is removed, followed by official quarantine for 30 days OR

(ii) have been soaked with agitation in a formic acid solution (100 kg salt (NaCl) and 12 kg formic acid per 1000 liters of water) maintained at below pH 3.0 for at least 48 hours followed by official quarantine for at least 30 days OR

(iii) Soaked with agitation in a 4% (w/v) solution of sodium carbonate (washing soda, Na_2Co_3) maintained at pH 11.5 Or above for at least 48 hours followed by official quarantine for at least 30 days

6. The State Veterinarian OTJIWARONGO (South of VCF) must be advised by telephone or fax of the probable arrival time of arrival at the taxidermist/tannery/quarantine facility south of the veterinary cordon fence and the seals may not be broken without permission or veterinary supervision. Trucks must immediately proceed to the approved taxidermist/tannery or quarantine by the most direct route via the main tarred road.
7. After off-loading the containers/vehicles must be disinfected to the satisfaction of the Veterinary official
8. This permit is valid for one consignment only and cannot be used after the expiry date.

Signature ..... Name in full .....

CHIEF VETERINARY OFFICER

(5c HS 10 /12)

PLEASE NOTE – Movements are subject to compliance with Ministry of Environment and Tourism where applicable.

TO FOOT AND MOUTH DISEASE FROM AREAS NORTH OF THE VETERINARY CORDON FENCE

Namibian Permit Number TR46/2018 SV Ref. Number KM/TFH/18
(consecutive serial number)

Namibian CITES/MET Permit 183047, 182227, 181920, 181912, 182044
182394, 181854, 181434, 180659, 180710

A. Description
1. Amount and description of product

Specie (which product derived)	Description of product	Nature of packaging	Number of units	Weight in kg
		SEE ATTACHED LIST		

2. **ORIGIN OF** hides/skin/infectious things: ZAMBEZI REGION

2.1 **Name** and address of consignor DREYER S JURIAAN

Telephone Number 0812878267 Fax Number

3.0 **Destination** of hides/skins/infectious thing Name and address of consignee

KINGS TAXIDERMY

3.2 Physical address of approved tannery/taxidermist or quarantine facility at destination

Street address 27 BAHNHOFF STREET, OTJIWARONGO

Telephone Number 067 306578 Fax Number

4 Means of transportation (air, road, rail) Road

4.1 Description of transport vehicle (flight number, Registration number) Toyota LandCruiser Brown Reg: JTS2 Nr. Trailer Reg: N192-669W.

(09/17)

REPUBLIC OF NAMIBIA

MINISTRY OF AGRICULTURE, WATER AND FORESTRY

Directorate of Veterinary Services

P.O. Box 116
Katima Mulilo
Ngoma Road
Email: jvule84@gmail.com

DVS – ZAMBEZI
Fax: (066) 253763
Tel: (066) 253142

MINISTRY OF AGRICULTURE WATER AND FORE. RY
STATE VETERINARIAN
2018 -10- 2 5
PO BOX ,16
KATIMA MULILO
REPUBLIC OF NAMIBIA

Enq: Dr. J. Yule
25 October 2018

RE: AMOUNT AND DESCRIPTION OF TROPHIES (TP46/2018)

Species (from which product derived)	Description of product	Nature of packaging	Number of Units	Weight in Kg
Buffalo.	2x Cape 2 x skulls & horn 1 x Backskin	Canvas	5	50kg
lechwe	2xCape 1 x backskin 2xSkull w horn	Canvas	5	30kg
Reedbuck	1x cape. 1 x backskin 1 x Skull w horns	Canvas	3	25
Zebra	2x flat skn	Canvas	2	40

Impala	1x cape 1x skull with horns	Carrier		4
Eland	1x cape 1x backskin	Carrier	2	3
Elephant	2x tusks 3x trunks 0x ears 1x skin panel, 3x tails	Carrier	15	85
Crocodile	2x skull 2x flat skin	Carrier	2	18
Hippo	4x pieces of upper jaw with tusks 1x skin panel 1x tail, 3x upper jaw with tusks 2x feet, 3x lower jaws with tusks	Carrier	14	105.
Lion	1x skull 1x full mount	Carrier	2	40.

TR46/2018

MINISTRY OF AGRICULTURE, WATER AND FORESTRY
STATE VETERINARIAN
2018 -10- 25
PO BOX 15
KATIMA MULILO
REPUBLIC OF NAMIBIA

VETERINARY SERVICES
PERMIT TO MOVE ANIMALS

Ref. TR 4/2018

In terms of the ...al Diseases and Parasites Act 1956 (Act 13 of 1956), as amended and subject to the ... specified below, permission is hereby granted to -

Name

Address

To move with/To transport Game trophies: Ekphant, Crocodile, Hippo, Lion, Buffalo, Lechwe, Reedbuck, Zebra, Impala, Eland

From the establishment Jamie trust Farms No. in the district/region of Kavango East

To the establishment Kings Academy No. in the district/region of Otjozondjupa

Owner Jamie trust

CONDITIONS

1. This permit-
   (a) is valid for 14 days from date of issue and for one movement only;
   (b) must accompany the animals mentioned above and must be produced for inspection on demand by any land owner stock owner a police officer, or any officer of the Directorate of Veterinary Services or authorised person;
   (c) does not authorise the removal of animals in quarantine or animals infected or suspected of being infected with a disease or infection or suspected of being infested with external parasites;
   (d) must be kept at the place of destination until ... collected by an authorised person;
2. The route followed must avoid all quarantined areas and areas infected or suspended of being infected with any diseases to which the animals are susceptible.
3. The holder of this permit must endorse or cause to endorse in the space provided below on this permit and the copy thereof the species and number of animals to be removed before departure from the place of origin; identifying marks/brands to be enumerated.
4. The holder of this permit must hand the copy of the permit over to the owner/supervisor on the farm of origin.
5. Contact with other animals not subjected to these conditions must be avoided.
6. On arrival of animals at ... destination the State Veterinarian concerned must be informed immediately
7. ... to quarantine/isolation at destination.

Other

MINISTRY OF AGRICULTURE, WATER AND FORESTRY
STATE VETERINARIAN
2018-10-25
P.O. Box 16
KATIMA MULILO
REPUBLIC OF NAMIBIA

Place Kat - Mulilo Date 25/10/18 State Veterinarian

Certificate of removal of animals - to be completed prior to embarkation

Species ... no. ... marks(where applicable) ...

Species ... no. ... marks(where applicable) ...

Inspected ... Date ...

Destination ...

I, ..Katima State Vet... ... name of office certify that:

1. The products described in A
2. The products originate from an area which has been free from Foot-and-Mouth Disease within a radius of 160 km for at least 12 months
3. Hides and skins have undergone the complete tanning process or processing up to "wet blue" or in the case of unprocessed hides and skins of ungulates or parts thereof, including elephant feet were:
   * wet-salted in sea salt with addition of 2% washing soda (Na_2CO_3) for at least 30 days under official supervision before dispatch.
   OR
   * sprayed with 5% washing soda (Na_2CO_3) and quarantined under official supervision for at least 30 days before dispatch.
   OR
   * sprayed with 5% formalin and quarantined under official supervision for at least 30 days before dispatch.
   - **Delete where not applicable**
4. Trophies consisting solely of horns, bones, hooves, claws, antlers and teeth must:
   (i) have been immersed in boiling water for an appropriate time so as to ensure that any matter other than horn, bone and teeth is removed; and then quarantined for 30 days **OR**

   (ii) have been soaked with agitation in a formic acid solution (100 kg salt (NaCl) and 12 kg formic acid per 1000 litres of water) maintained at below pH 3.0 for at least 48 hours and then quarantined for 30 days.
   (iii) **Or** soaked with agitation in a **4% (w/v) solution of sodium carbonate** (washing soda, Na_2Co_3) maintained at pH 11.5 or above for at least 48 hours and then quarantined for 30 days.

   Date of treatment 17-9-18 Date of release 24-10-18 .....
   - **Delete where not applicable**

5. The trophies were individually packaged in transparent containers which were closed immediately after treatment without being in contact with any other products of animal origin to avoid any subsequent contamination.
6. The packages were loaded into sealed containers under my direct supervision and sealed.

   Seal number(s) 205544393 up to 205544398; 205544376 up to 205544378 205319215, 205319214 205544400, 205319218, SCSS E7865692, 205319222, 205319210, 205319123, 205319219,
7. The state veterinarian destination at has been alerted by means of fax or telephone to expect the arrival of the consignment at ..Kings.. (name of approved taxidermist).

8. Done at (place) Katima Mulilo on 25/10/18 (date)
9. Signature

OFFICIAL VETERINARIAN Official Stamp

Name in Print: Yule Justin

Address P.O Box 116 Katima Mulilo

MINISTRY OF AGRICULTURE, WATER AND FORE.. RY
STATE VETERINARIAN
2018 -10- 25
PO BOX 116
KATIMA MULILO
REPUBLIC OF NAMIBIA

A COPY OF THE COMPLETED PERMIT MUST BE FAXED TO THE STATE VETERINARIAN AT DESTINATION PRIOR TO DEPARTURE.

ENDORSEMENT BY VETERINARY OFFICIALS AT GATES

Checked by me and found correct: Name of gate, Number of containers, seals intact, vehicle data etc.

P.V. Hamutenya Mohunani Gate

SIGNATURE AND DESIGNATION

26/10/2018
DATE

(09 17)

Section E, question 9(c)

Conservation and sustainability

Conservation is one of the major cornerstones of the Namibian experience. Jamy Traut Hunting Safaris does not only focus on a unique hunting experience, but also realize the long-term responsibilities towards conservation together with its social responsibility. We have the following social and environmental programs in place:

- Programs that introduced the relocation of White Rhino on private owned land.
- All the meat from all our animals, from the elephant to the steenbok and duiker, are utilized to help sustain the local communities,
- First hand involvement in anti-poaching units across Namibia.
- We are converting to solar power in our camps.
- A strict game management plan is maintained, to ensure that good quality trophies are taken consistently.
- Actively involved in management of human-wildlife conflict with Elephants
- Working with the Africat foundation in the north-west of Namibia to monitor Lion populations
- Make contributions to conservation through education
- Donation programs are run in all areas where safaris are conducted or as needs arise.
- Involved with rural communities in Namibia to build a better future for the youth.
- Jamy Traut Hunting Safaris promotes ethical and sustained wildlife practices.
- Jamy Traut is a proud member of NAPHA (Namibian Professional Hunters Association, Dallas Safari Club and Safari Club International.

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: _____

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 le[redacted]

    Applicant's signature (b) (6) [redacted] Date: 03/04/2019

    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.

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).

Form 3-200-20

OMB Control No. 1018-009
Expires 08/31/202

MAR 13 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Eliacostas	George		Mr.

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Homer Glen	Illinois	60491	Will	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

03-06-2019

ext page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanyin 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 anim and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

AS PER CONTACT INFORMATION ABOVE

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owner of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

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 information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

COUNTRY:ZIMBABWE GIS:VC141789. GUNUNDWE RANCH "SAVE VALLEY CONSERVANCY"
NEAREST CITY MASVINGO:MASVINGO PROVINCE

   b. Date wildlife was hunted:

09/JULY/2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

OUTFITTER:DESFOUNTAIN & JONES SAFARIS PVT/LTD.
PROFESSIONAL HUNTER:MR.DALE DESFOUNTAIN.LICENCE NUMBER:90.VALID

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country a the country of export/re-export and must match with the foreign export/re-export document]:

DESFOUNTAIN AND JONES SAFARIS,9 DOON ROAD BORROWDALE HARARE ZIMBABWE 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). ATTATCHED

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 o your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	LYNN DUNCAN
Address:	LD FORWARDING CO PVT/LTD
City:	106 B CORONATION AVENUE/GREENDALE
State/Province:	HARARE
Country, Postal Code:	ZIMBABWE

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Servic (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if yc could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

A total of 600 elephant were translocated into the save valley conservancy up to January 1998,2019 the population estimate via aerial game consensus puts the population at 4860 individuals.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

$27450.00 was part of the safari value.The payments received by D&J Safaris helps maintain their concession,by active rangers protecting the animals that roam freely.Also the drilling of water holes pumping costs salaries etc.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

Building and support of local schools and clinics bordering the concession as well as community awareness programs educating the populous of the value of the African wildlife NB:NO ELEPHANTS HAVE BEEN POACHED IN THE SVC IN OVER 20 YEARS

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more th[redacted]ar.

    Applicant's signatur[redacted] Date: 3/6/2019

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

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)

0000080611
COMPLETED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Desfountain And Jones Safaris(PVT) LTD	**Client's Full Name**	GEORGE ELIACOSTAS
ZTA (HOP) No.	HOP0294	**Passport Number**	(b) (6)
		Country of Issue	UNITED STATES
Address	P O Box 9164 Hillside Bulawayo	**Address**	(b) (6) GLEN ELLYN 1L 60137
Name of Professional Hunter	DALE DESFOUNTAIN	**Licence No.**	90
Telephone		**Fax**	0772353180
Number of Accompanying Guests		1	
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	**Address**	8 RIVONIA ROAD MOUNT PLEASANT HARARE
Name of Shipping Agent	LD FORWARDING CO. LTD	**Address**	P O BOX GD467 GREENDALE HARARE TEL 492650
Name of Foreign Agent	Global Outfitters/ Gary Deschene	**Address**	P O Box 70 ULM Montana 59485

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Msaise	Masvingo	
2	Gunundwe	Masvingo	
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	02-07-2018
Date of Safari To	13-07-2018
Daily Rate Charged For Big Game USD	500.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	75.00
Number of Accompanying Guests	1

ZPWMA
Date Stamp

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(i) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

(ii) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	6,000.00	**Total Guests rate**	900.00
Less Commission	.00	**Total Trophy fees**	20,550.00
Other fees (Incidentals)	.00	**Grand Total USD**	27,450.00
Percentage Commission Charged	.00	**Total Processing Fees**	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	W/K	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	KUDU	M	Killed	Msaise	VC 982749	06-JUL-2018	115	1,200
2	PORCUPINE	M	Killed	Msaise	VC 582715	12-JUL-2018		200
3	ELAND	M	Killed	Msaise	VC 298746	06-JUL-2018	89	1,400
4	BUFFALO	M	Killed	Msaise	VC 657699	02-JUL-2018	102	4,000
5	WILDEBEEST	M	Killed	Msaise	VC 879710	03-JUL-2018	68	800
6	BABOON	M	Killed	Msaise	VC 125749	13-JUL-2018		100
7	ZEBRA	M	Killed	Msaise	VC 379747	03-JUL-2018		800
8	ZEBRA	M	Killed	Msaise	VC 231715	09-JUL-2018		800
9	IMPALA	M	Killed	Msaise	VC 944710	05-JUL-2018	56	250
10	ELEPHANT - WITH TUSKS	M	Killed	Gunundwe	VC 141789	09-JUL-2018		11,000
11								
12								
13								
14								
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Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

MAR 1 1 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
CROELL	CURTIS	K	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			cindi.rulon@procargousa.com

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

[illegible]		[illegible]	
[illegible]		[illegible]	
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]		
[illegible]	[illegible]	[illegible]	[illegible]

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
LAWLER	IOWA	52154	CHICKASAW	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

atty in fact 03/11/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

PRO CARGO USA
15619 MORALES ROAD
HOUSTON, TEXAS 77032 ATTN: CINDI RULON

SELF ADDRESSED FED EX ENVELOPE ENCLOSED

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

CINDI RULON CINDI.RULON@PROCARGOUSA.COM
281-220-3176

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      LOXODANTA AFRICAN- 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 information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

      BWABATA WEST CONSERVANCY NEAR DIVUNDU NAMIBAI

   b. Date wildlife was hunted:

      SEPTEMBER 7, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

PROFESSIONAL HUNTER J.H PIENAAR

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

TROPHHAENDIENSTE TQAXIDERMY P.O. BOX 21068 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.H. PIENAAR
Business Name:	TROHAENDIENSTE TAXIDERMY
Address:	PO BOX 21068
City:	WINDHOEK
State/Province:	
Country, Postal Code:	NAMIBIA

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

SINCE 1975 THE POPULATION HAS BEEN GROWING AT AN AVERAGE RATE OF 4.5% PER ANNUM WITH MANAGED HUNTING. THE POPULATION WAS 7,500 IN 1975 AND NOW NUMBERS OVER 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, local community, or government?

40% OF THE TROPHY FEES I PAID WENT TO THE GAME PRODUCTS TRUST FUND, A GOVERNMENT ENTITY THAT OVERSEES REPAIRS, MAINTENANCE AND SALARIES FOR GOVERNMENT RANGERS AND THEIR EQUIPMENT USED TO MONITOR AREAS WHERE ELEPHANTS ROAM. 40% GOES TO THE LOCAL COMMUNITY.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

THE OUTFITTER IS ACTIVELY INVOLVED IN ANTI-POACHING EFFORTS AND THE PROFESSONAL HUNTER IS A TRUSTEE ON HUNTERS UNITED AGAINST POACHING (HUAP)

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: [signature] Date: 03/11/2019

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

Database Certificate No: 0058047

0058047

Original

[X] EXPORT

[ ] RE-EXPORT

[ ] IMPORT

[ ] OTHER:

2. Valid until: 19/05/2019

3. Importer (name and address)

KURTIS [redacted] CROELL

[redacted] (b) (6)

LAWLER

IA 52154

3a. Country of import: U.S.A

4. Exporter / Re-exporter (name,address and country)

J. H. PIENAAR

PRIVATE BAG 2105

GOBABIS

NAMIBIA

Signature of the applicant

5. Special conditions

Not valid if not certified by the Namibian customs

Tusks no's: NA 18 0008 24.20 & NA 18 0007 31.65

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 ENVIROMENT AND TOURISM

Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp No.: 1647163

	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. 2Item	11a. 46/90 (2018)
	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. skin panels	10. II W	11. 1Item	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 progated for commercial purposes
*** for pre-Convention specimens

MINISTRY OF ENVIRONMENT AND TOURISM, REPUBLIC OF NAMIBIA
19 NOV 2018
Private Bag 13306 • Windhoek
Tel: 284284 Fax: 226861

13.THIS PERMIT IS ISSUED BY: J. Shapi

Windhoek — Place

19/11/2018 — 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 / Re-export | Date | Signature | Official stamp and title

Original

Nampriot: 2308

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		182631
VALID FROM:		01/09/2018
VALID TO:		15/09/2018
RECEIPT No.:		PS76520 BV

PERMIT TO HUNT FOR TROPHIES 5464

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter: K.K. Cranell

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok	/	Impala Common	2x—	Springbok		Other	/
Buffalo	1x—	Klipspringer		Steenbok		*Please report back within	
Crocodile		Kudu		Warthog	1x—	48 hours after the hunt	
Dik-Dik		Lechwe		Waterbuck		*All activities must be done	
Eland		Oryx (Gemsbok)		Wildebeest, Black		in accordance with Regulation	
Elephant	1x—	Ostrich		Wildebeest, Blue		106 (Gazette no 3551, 1997),	
Giraffe		Reedbuck	2x—	Zebra Burchell's		of the nature Cons Ordinance	
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's		4 of 1975 (4 of 1975)	
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: Bwabwata West Conservancy

Guided by (name of guides): J.H. Pienaar (Jnr + Snr)

Elvis Markel E.Markel

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way and is not transferable.

prime press 042018

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
1	7-9-18.	ELAND BULL	~~135~~	135		49			4	♂	BLIJABLIJAAN WEST.			(b) (6)	
	15-9-18.	BUFFALO	148	44	46	238			8	♂	BLIJABLIJAAN WEST				

*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.

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 04569

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant: K.K Croell

2. Identity No. / Passport No.: USA

3. Residential address: .....

Tel No.: .....

4. Postal address: P.O. Box 21068
Windhoek

(b) (6)

SIGNATURE OF APPLICANT

5. From where are products obtained: Bwabwata

6. The following documents are attached as proof of ownership:

(a) Permit No: 182631

(b) .....

(c) .....

(d) .....

(e) .....

MINISTRY OF ENVIRONMENT AND TOURISM
PERMIT OFFICE
2018 -09- 26

26. 09. 2018

DATE

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
elephant	Tusk R	117	142	45	47	61	24.34	NA 18 0008 24.20
	Tusk L	130	184	46	47	66	32.00	NA 18 0007 31.65
	Feet x 4							
	Ears x 2							
	Toes x 6							
	Tails x 1							

prime press 052013

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

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.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b) (6) [redacted]

Cell Phone (b) (6) [redacted]

Email address (b) (6) [redacted]

x Individual

KNOW ALL MEN BY THESE PRESENTS: That, x Kurtis K. Croell (Full Name of Person), residing at x (b) (6) [redacted] Lowler, Iowa, UnitedStates 52154 hereby constitutes and appoints each of the following persons - John Rulon CHB

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, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize 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 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 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 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 111.35(a), election is made waiving the right to receive invoices, supporting documents and correspondences from John Rulon CHB, who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

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 I 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

(Print name) x Kurt Croell

has caused th (b) (6) [redacted] **ed:**

(Signature) x [redacted]

((Date) x November 9, 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 29 2019

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

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Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
DooLittle	Matthew	Dale	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address: Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Holland	Michigan	49423	Ottawa	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

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of $100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee–attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 03/26/2019

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   N/A

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Matthew Doolittle Phone: (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☉ No ○ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Scientific name: Loxodonta africana Common Name: African Elephant

   b. Sex (if known). Female

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

N/A

   b. Date wildlife is to be hunted:

N/A

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

N/A

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

Atherstone Nature Reserve is based in the Limpopo province of South Africa near a small town called Dwaalboom. Biggest town is 90KM away called Thabazimbi.

   b. Date wildlife was hunted:

September 22, 2018 through September 25, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Numzaan Safaris (company conducting the hunt) Stef Swanepoel (Hunting 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 foreign export/re-export document]:

Swift Dip Portion 1 Bethanie Makoppa 0381 Limpopo Province 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 information

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 Air Cargo Systems
Address:	34 5th Ave, Bredell AH,
City:	Kempton Park
State/Province:	1619
Country, Postal Code:	South Africa

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Please see separate attached information

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

Please see separate attached 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 landowner that provide a conservation benefit to the species being hunted/species hunted?

Please see separate attached information

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more tha[redacted]

Applicant's signature (b) (6) [redacted] Date: 03/26/2019

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: Stef Swanepoel

   a. Years in business: 26 Years

   b. Name of company conducting hunt: Numzaan Safaris

   2. Name of concession: Atherstone Nature Reserve Size in km^2: 23 000 hectors or 56 000 acers

   a. Land tenure: __ Government lease __ Community __ Private ranch __ Private conservancy

   b. Length of concession agreement: 1 Year Can it be renewed? X Yes __ No

   c. Length of renewal, if applicable: Year by Year

   d. Estimated total amount received in trophy fees last year, if applicable: $ $ N/A

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: Please see attached document

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Atherstone Nature Reserve is based in the Limpopo province of South Africa near a small town called Dwaalboom. Biggest town is 90KM away called Thabazimbi

   g. If the concession borders a national park, please provide the park name: N/A

   h. Description of general and distinctive habitat features and any water features: Atherstone Nature Reserve consist typically bushveld terrain. It is flat with no mountains or rivers. Typical vegetation constist of mainly Acacia Trees and very little Marula trees. Grass plains do exist int he reserve but are limited

3. Are there any communities living in the concession? NO Yes __ No

   a. If so, estimated number of people or villages in the concession? _____

4. Are there communities bordering this concession? __ Yes X No

   a. If so, estimated number of people or villages around the concession? _____

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant				
Lion				
Leopard				
Prey species				

6. Total employment number: _____

   a. Please identify the number and type of all employees:

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	26	6
Trackers	28	20
Anti-poaching scouts/rangers	2	2
Other anti-poaching		
Cooks/housekeepers	12	10
Community coordinators		
Managers	6	5
Biologists		
Others: _____		

7. Number of staff employed in the off-season: 74

   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	2	2	
Managers	1	1	
Maintenance	2	2	
Road opening/construction			
Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: 2

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? Yes

   c. Months during which anti-poaching patrols are conducted: January - December

   d. Number of anti-poaching patrols per month: Daily

   e. Description of anti-poaching equipment, vehicles, etc.: 2 Vehicles, Quad Bike, Kabota side by side. 2 x Binoculars, 2 x Bicycle, 2 x fully equipped anti poaching scouts

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Reserve management in conjunction with private land owners

   g. Do you offer rewards to poaching informants leading to arrest? X Yes __ No

   h. Do you offer rewards to poaching informants upon conviction? X Yes __ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? _____

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	R100 000	R120 000	R 60 000	Cost of scouts is becoming unbearable
Equipment	R10 000	R5 000	R 10 000	
Vehicles	R200 000	R15 000	R 15 000	
Petrol	R20 000	R 20 000	R 20 000	
Rewards paid				
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	2	3		Caught 4 P
Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				
Meat poachers arrested				
Other poachers arrested		4		Rhino Poachers
Poachers convicted		4		
Snares/gin traps collected				
Firearms confiscated		1		
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered				
Other: _____				

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? X Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? Government employees are given carcasses from the hunting in Atherstone Reserve. We Further contribute food and drinks to the local police station ono their infomation and sport days.

c. Does the company provide game meat to nearby communities? X Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: We provide to the local communities on a weekly basis to the value of $200 per week.

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. Numzaan Safaris is one of the firste outfitters that Nature conservation contacts if there is an problem animal to be delt within the area.

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? Rand

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? Rand

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)				
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching		R80 000		
Local government activities				
Water infrastructure improvements	R10 000	R15 000	R 25 000	
Sports teams funded	R5 000	R10 000	R 27 000	
Construction materials donated		R10 000	R10 000	
Other: Meat	R 20 000	R 30 000	R40 000	
Other: Training	R 5 000	R 10 000	R12 000	
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: 400 2016: 500 2017: 600
Percentage of U.S.	2015:	2015:	2015:	2015: 100%

clients	2016: 2017:	2016: 2017:	2016: 2017:	2016: 100% 2017: 100%
Trophy fees paid by U.S. clients	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:	2015: $2'800 000 2016: $3'500 000 2017: $4'200 000

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: 100%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc. Please see attached document

14. I declare that the foregoing is true and correct.

    Signature: _____

    Name: _____ Title: _____

2.e
Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, ect.? If so please explain

The Private Landowners which own 30% of the land within Atherstone Nature Reserve. Therefore they are also responsible for the general upkeep and wellbeing of the percentage of animals within the reserve. From the yearly game counts the private land owners receive 30% of the game quota that is allocated either for hunting or live game sales.

The Private Land owners have assisted the reserve in equipping boreholes, drilling boreholes, diesel of anti poaching patrols as well as diesel for the pumping of water to dames, we have assisted with equipping the reserve with all new batteries for the 144km of electric fence line as well as the fencing material for the fence posts ect. The Private Landowners have a very healthy relationship with the reserve management and assist whenever they are asked.

The community has a very well run security cluster which the private land owners are members of and has assisted in the past to capture Rhino poachers. This was all run and executed by David Freeburn. All labour is sourced from the local community.

13
Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concessions improvments (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

The Private Landowners and Atherstone Nature Reserve have very strong working relationship. Atherstone runs the day to day management and the Private Landowners assist when they are needed. To date the private sector has equipped numerous boreholes as well as drilled for new boreholes.

The Private Landowners have equipped much needed pvc pipes to dams and reservoirs. They help with the maintenance of vehicles, heavy machinery as well a quad bikes. The continuous maintenance of the 87KM fence line have been funded by the private land owners. New battries and energizers have been replaced to make sure that the fences are Elephant proof.

The Elephant management plan has been a collaboration with Biodiversity, Atherstone and the private landowners which has now been accepted by the Minister of Tourism, Edna Molewa and has been adopted by Atherstone. It is the intention of Atherstone Nature reserve with the help of the private landowners to implement the Elephant management plan. Within this management plan ages, sexes and herd structures are discussed in detail.

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

A. LP Nº 21300

Duration of Hunt: Commenced 22 / 09 / 2018 Terminated 25 / 09 / 2018

Tick appropriate Province block where hunt took place (separate sheet for each Province):

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)
			X					

POST PERMIT TO (Mark correct block with X)

PROFESSIONAL HUNTER

Name: DAVID FRASER
Business Address PO BOX 71
DWAALBOOM
0319
ID No 8103225108087
PH Permit No ZA/LP/87866
Date 25/09/2018 Sign (6)(6)

CLIENT

Name: Matthew D Obolitte
Permanent Postal Address (6)(6)
stone Ct. Holland, MI
Code 49423 Country USA
Passport No (6)(6)
Tel/Fax: (6)(6)
Date 25/09/18 Signature (6)(6)

HUNTING OUTFITTER

Name: STEF SWANEPOEL
Business Address PLOT 83
SPITSKOP, LIMPOPO Code: 0380
ID No 6602025011088
Tel No: 0828541280 Fax No: stefo nuwzoom.co.za
HO Permit No ZA/LP/(6)(6)
Date: 25/09/2018 Sig (6)(6)

Farm Name Registration No.	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date of Hunt From	Date of Hunt To	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
GROOTVLEI KP160	WARMBAD THABAZIMBI	MASHACA STONE NATURE RESERVE DWAALBOOM 0319	7342	22/09	25/09	ELEPHANT	1	1		TUSKS + TAIL + EARS + PANEL

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: .....
.....Code.....
Country: ..... Trophy Export Date (Estimate): .....

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 JUN 27 2017

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cusick	Todd	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see ins	
(b) (6)		N/A	

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)	N/A	N/A	(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Provo	UT	84604	Utah	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and b (b) (6) ein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/pers (b) (6) amped signatures) — Date of signature (mm/dd/yyyy): 6/17/17

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 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:_____(Import is limited to two per hunter per calendar year)

1

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:
   Kavango East, Bwabwata West, S18 09" 162 and E021 42" 495 Divundu, Rundu Namibia

   b. Date wildlife is to be hunted:
   5 to 18 September, 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, tusk, ears, tail hair, and 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:

   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:	Shipper Dip/Packer: Louw Nel www.trophaendienste.com PO BOx 21068 Windhoek, Namibia +264 61 232 236 Professional Hunter: J.H. Pienaar PO Box 1100, Gobabis Physical address: Farm Hester 407, Gobabis, Namibia Physical Camp Address: Buffalo Camp, Bwabwata West, Divundu, 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: (b) (6) [redacted] Date: 6/7/17

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 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):
Todd Cusick
(b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA41890C-0

Effective: 08/29/2017 Expires: 08/28/2018

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 Ogilvie
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD DENNIS CUSICK
(b) (6) [redacted]
PROVO, UT 84604
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

Authorizations and Conditions:

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.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-52

OMB Control No 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1 a. Last Name	1 b. First Name	1.c. Middle Name/Initial	1 d. Suffix
Cusick	Todd	Dennis	

(b) (6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1 b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Provo	UT	84604	Utah	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other *applic* [illegible], and I certify that the information submitted in this application for a permit is complete and accurate to t[illegible]at any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

March 25, 2019

Signature of applican[illegible] or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Todd Cusick (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA41890C-0

5 Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signature: [redacted] Date: March 25, 2019

   b. For **CHANGES** to original application:

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

   Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA41890C-0

Effective: 08/29/2017 Expires: 08/28/2018

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 Ogilvie
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD DENNIS CUSICK
(b) (6) [redacted]
PROVO, UT 84604
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

Authorizations and Conditions:

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.

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 JUN 27 2017

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cusick	Todd	[redacted]	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see ins	
(b) (6)		N/A	

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)	N/A	N/A	(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Provo	UT	84604	Utah	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and b[redacted]ein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature of applicant/pers[redacted]amped signatures) — Date of signature (mm/dd/yyyy): 6/17/17

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 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:_____(Import is limited to two per hunter per calendar year)

1

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:
   Kavango East, Bwabwata West, S18 09" 162 and E021 42" 495 Divundu, Rundu Namibia

   b. Date wildlife is to be hunted:
   5 to 18 September, 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, tusk, ears, tail hair, and 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:

   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:	Shipper Dip/Packer: Louw Nel www.trophaendienste.com PO BOx 21068 Windhoek, Namibia +264 61 232 236 Professional Hunter: J.H. Pienaar PO Box 1100, Gobabis Physical address: Farm Hester 407, Gobabis, Namibia Physical Camp Address: Buffalo Camp, Bwabwata West, Divundu, 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: (b) (6) [redacted] Date: 6/7/17

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 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):
Todd Cusick
(b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA41890C-0

Effective: 08/29/2017 Expires: 08/28/2018

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 Ogilvie
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD DENNIS CUSICK
(b) (6)
PROVO, UT 84604
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

Authorizations and Conditions:

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.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-52

OMB Control No 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1 a. Last Name	1 b. First Name	1.c. Middle Name/Initial	1 d. Suffix
Cusick	Todd	Dennis	

(b) (6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1 b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Provo	UT	84604	Utah	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other *applic* [illegible], and I certify that the information submitted in this application for a permit is complete and accurate to t[illegible]at any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

March 25, 2019

Signature of applican[illegible] or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Todd Cusick (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA41890C-0

5 Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signature: [redacted] Date: March 25, 2019

   b. For **CHANGES** to original application:

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

   Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA41890C-0

Effective: 08/29/2017 Expires: 08/28/2018

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 Ogilvie
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD DENNIS CUSICK
(b) (6) [redacted]
PROVO, UT 84604
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

Authorizations and Conditions:

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.

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 JUN 27 2017

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cusick	Todd	[redacted]	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see ins	
(b) (6)	[redacted]	N/A	[redacted]

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)	N/A	N/A	(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

2. Tax identification no.	3. Description of business, agency, Tribe, or institution		

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name		

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Provo	UT	84604	Utah	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and [redacted] may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/pers[redacted] (b) (6) [redacted] amped signatures) — Date of signature (mm/dd/yyyy): 6/17/17

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 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:_____(Import is limited to two per hunter per calendar year)

1

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:
   Kavango East, Bwabwata West, S18 09" 162 and E021 42" 495 Divundu, Rundu Namibia

   b. Date wildlife is to be hunted:
   5 to 18 September, 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, tusk, ears, tail hair, and 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:

   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:	Shipper Dip/Packer: Louw Nel www.trophaendienste.com PO BOx 21068 Windhoek, Namibia +264 61 232 236 Professional Hunter: J.H. Pienaar PO Box 1100, Gobabis Physical address: Farm Hester 407, Gobabis, Namibia Physical Camp Address: Buffalo Camp, Bwabwata West, Divundu, 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: (b) (6) Date: 6/7/17

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 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):
Todd Cusick
(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.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA41890C-0

Effective: 08/29/2017 Expires: 08/28/2018

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 Ogilvie
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD DENNIS CUSICK
(b) (6) [redacted]
PROVO, UT 84604
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

Authorizations and Conditions:

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.

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).

MacDonald, T im <tim_macdonald@fws.gov>

Re: Jun 29 2017 10:30:00; Acknowledgement letter for Permit No. "41890C""

1 message

MacDonald, T im <tim_macdonald@fws.gov> Tue, Aug 29, 2017 at 9:41 AM
To: Todd Cusick <(b) (6)

Good morning Todd,

I am trying to get your permit issued by today. Currently you have me mailing you the permit to your home address. If you would like overnight delivery you will need to provide me with a per-paid shipping label.

I will attempt to mail this by the end of the work day here (east coast), if I do not hear from you before then concerning overnight shipping I will just mail it out.

(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

On Mon, Aug 28, 2017 at 3:43 PM, Todd Cusick <(b) (6) wrote:

> Mr. MacDonald:
>
> I spoke with Louis in your office today. I understand you have been assigned the below noted permit application.
>
> I am leaving one week from today to travel through Angola, Namibia, South Africa, and Tanzania. While in Namibia I intended to hunt elephant which is the subject of the below permit application.
>
> If you need to contact me while I am traveling please use the following contact information (note the email address is different than below):
>
> (b) (6)
>
> The (b) (6) will be usable but not as reliable while I am traveling.
>
> Also, it was my understanding that my permit processing time would around 30 days and I should wait 21 days before inquiring; it has now been 60 days. My hunt which is the subject of the permit begins September 6th. If possible please kindly inform me by then if the permit has been granted as the costs associated with this is quite prohibitive especially considering the unknown regarding the import permit.
>
> Thank you.
>
> Have a nice day!

Sincerely,

Todd Cusick
CMC Rock

Begin forwarded message:

From: E-Mail Sys#5 <permits@fws.gov>
Subject: Jun 29 2017 10:30:00; Acknowledgement letter for Permi t No. "41890C""
Date: June 29, 2017 at 8:30:00 AM MDT
To (b) (6)
Cc: permits@fws.gov
Reply-To: permits@fws.gov

TODD DENNIS CUSICK
(b) (6)
PROVO, UT 84604
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 06/27/2017; check number (b) (6) accompanied the application. Your application has been assigned the following PRT identification number: MA41890C-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.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA41890C-0

Effective: 08/29/2017 Expires: 08/28/2018

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 Ogilvie
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD DENNIS CUSICK
(b) (6) [redacted]
PROVO, UT 84604
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

Authorizations and Conditions:

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.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

MAR 1 1 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
CROELL	CURTIS	K	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			cindi.rulon@procargousa.com

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

[illegible]		[illegible]	
[illegible]		[illegible]	
[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]		
[illegible]	[illegible]	[illegible]	[illegible]

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
LAWLER	IOWA	52154	CHICKASAW	USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

atty in fact 03/11/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

PRO CARGO USA
15619 MORALES ROAD
HOUSTON, TEXAS 77032 ATTN: CINDI RULON

SELF ADDRESSED FED EX ENVELOPE ENCLOSED

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

CINDI RULON CINDI.RULON@PROCARGOUSA.COM
281-220-3176

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      LOXODANTA AFRICAN- 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 information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

      BWABATA WEST CONSERVANCY NEAR DIVUNDU NAMIBAI

   b. Date wildlife was hunted:

      SEPTEMBER 7, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

PROFESSIONAL HUNTER J.H PIENAAR

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

TROPHHAENDIENSTE TQAXIDERMY P.O. BOX 21068 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.H. PIENAAR
Business Name:	TROHAENDIENSTE TAXIDERMY
Address:	PO BOX 21068
City:	WINDHOEK
State/Province:	
Country, Postal Code:	NAMIBIA

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

SINCE 1975 THE POPULATION HAS BEEN GROWING AT AN AVERAGE RATE OF 4.5% PER ANNUM WITH MANAGED HUNTING. THE POPULATION WAS 7,500 IN 1975 AND NOW NUMBERS OVER 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, local community, or government?

40% OF THE TROPHY FEES I PAID WENT TO THE GAME PRODUCTS TRUST FUND, A GOVERNMENT ENTITY THAT OVERSEES REPAIRS, MAINTENANCE AND SALARIES FOR GOVERNMENT RANGERS AND THEIR EQUIPMENT USED TO MONITOR AREAS WHERE ELEPHANTS ROAM. 40% GOES TO THE LOCAL COMMUNITY.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

THE OUTFITTER IS ACTIVELY INVOLVED IN ANTI-POACHING EFFORTS AND THE PROFESSONAL HUNTER IS A TRUSTEE ON HUNTERS UNITED AGAINST POACHING (HUAP)

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: [signature] Date: 03/11/2019

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

PERMIT / CERTIFICATE No.

Database Certificate No: 0058047

0058047

Original

[X] EXPORT

[ ] RE-EXPORT

[ ] IMPORT

[ ] OTHER:

2. Valid until: 19/05/2019

3. Importer (name and address)

KURTIS (b) (6) CROELL

(b) (6)

LAWLER

IA 52154

3a. Country of import: U.S.A

4. Exporter / Re-exporter (name,address and country)

J. H. PIENAAR

PRIVATE BAG 2105

GOBABIS

NAMIBIA

Signature of the applicant

5. Special conditions

Not valid if not certified by the Namibian customs

Tusks no's: NA 18 0008 24.20 & NA 18 0007 31.65

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 ENVIROMENT AND TOURISM

Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse): H

5b. Security stamp No.: 1647163

	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. 2Item	11a. 46/90 (2018)
	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. skin panels	10. II W	11. 1Item	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 progated for commercial purposes
*** for pre-Convention specimens

MINISTRY OF ENVIRONMENT AND TOURISM, REPUBLIC OF NAMIBIA
19 NOV 2018
Private Bag 13306 • Windhoek
Tel: 284284 Fax: 226861

13.THIS PERMIT IS ISSUED BY: J. Shapi

Windhoek — Place

19/11/2018 — 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 / Re-export | Date | Signature | Official stamp and title

Original

Nampriot: 2308

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Permit Office
Tel +264-61-284 2538/2506

PERMIT No.:		182631
VALID FROM:		01/09/2018
VALID TO:		15/09/2018
RECEIPT No.:		PS76520 BV

PERMIT TO HUNT FOR TROPHIES 5464

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter: K.K. Cranell

Residential Address:

Country: U.S.A

To hunt the specified number of game for the sake of trophies:

SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER	SPECIES: COMMON NAME	NUMBER
Blesbok	/	Impala Common	2x—	Springbok		Other	/
Buffalo	1x—	Klipspringer		Steenbok		*Please report back within	
Crocodile		Kudu		Warthog	1x—	48 hours after the hunt	
Dik-Dik		Lechwe		Waterbuck		*All activities must be done	
Eland		Oryx (Gemsbok)		Wildebeest, Black		in accordance with Regulation	
Elephant	1x—	Ostrich		Wildebeest, Blue		106 (Gazette no 3551, 1997),	
Giraffe		Reedbuck	2x—	Zebra Burchell's		of the nature Cons Ordinance	
Grey Duiker		Rhinoceros, Black		Zebra Hartmann's		4 of 1975 (4 of 1975)	
Hartebeest		Rhinoceros, White		Cheetah			
Hippopotamus		Roan		Leopard			
Impala Black-Faced		Sable		Lion			

On the following farms / hunting concessions / safari / guestfarm: Bwabwata West Conservancy

Guided by (name of guides): J.H. Pienaar (Jnr + Snr)

Elvis Markel E.Markel

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way and is not transferable.

prime press 042018

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
1	7-9-18.	ELAND BULL	~~135~~	135		49			4	♂	BLIJABLIJAM WEST.			[redacted]	
	15-9-18.	BUFFALO	148	44	46	238			8	♂	BLIJABLIJAM WEST				

*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.

REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

No.: A 04569

APPLICATION TO POSSESS CONTROLLED GAME PRODUCTS

1. Christian name(s) and surname of applicant: K.K Croell

2. Identity No. / Passport No.: USA

3. Residential address: .....

Tel No.: .....

4. Postal address: P.O. Box 21068
Windhoek

[redacted]

SIGNATURE OF APPLICANT

5. From where are products obtained: Bwabwata

6. The following documents are attached as proof of ownership:

(a) Permit No: 182631

(b) .....

(c) .....

(d) .....

(e) .....

MINISTRY OF ENVIRONMENT AND TOURISM
Received
2018 -09- 26

26. 09. 2018

DATE

ITEM	PRODUCT	LENGTH INSIDE CURVE	LENGTH OUTSIDE CURVE	GIRTH AT BASE	GIRTH AT CENTRE	LENGTH LIPMARK TO BASE	WEIGHT IN KG	ISO CODE
elephant	Tusk R	117	142	45	47	61	24.34	NA 18 0008 24.20
	Tusk L	130	184	46	47	66	32.00	NA 18 0007 31.65
	Feet x 4							
	Ears x 2							
	Toes x 6							
	Tails x 1							

prime press 052013

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

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.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b) (6) [redacted]

Cell Phone (b) (6) [redacted]

Email address (b) (6) [redacted]

x Individual

KNOW ALL MEN BY THESE PRESENTS: That, x Kurtis K. Croell (Full Name of Person), residing at x (b) (6) [redacted] Lowler, Iowa, UnitedStates 52154 hereby constitutes and appoints each of the following persons - John Rulon CHB

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, steed 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 merchandize 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 merchandize; to receive any merchandize 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 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 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 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 111.35(a), election is made waiving the right to receive invoices, supporting documents and correspondences from John Rulon CHB, who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

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 I 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

(Print name) x Kurt Croell

has caused the (b) (6) [redacted] **ed:**

(Signature) x (b) (6) [redacted]

((Date) x November 9, 2018

OMB Control No 1018-0093
Expires 08/31/2020

RCVD MAR 25 2019

LB

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1 a. Last Name	1 b. First Name	1.c. Middle Name/Initial	1 d. Suffix
Cusick	Todd	Dennis	

(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1 b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Provo	UT	84604	Utah	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other *applic*(b) (6) [redacted], and I certify that the information submitted in this application for a permit is complete and accurate to t[redacted]at any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

March 25, 2019

Signature of applican[redacted] or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Todd Cusick (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA41890C-0

5 Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

      I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

      Permittee's signature: (b) (6) [redacted] Date: March 25, 2019

   b. For **CHANGES** to original application:

      On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

      I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

      Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA41890C-0

Effective: 08/29/2017 Expires: 08/28/2018

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 Ogilvie
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD DENNIS CUSICK
(b) (6) [redacted]
PROVO, UT 84604
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

Authorizations and Conditions:

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.

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

LB

RCVD OCT 18 2016

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Barany	Bruce	R.	N/A

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		N/A

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
USA (b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	N/A

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
N/A	N/A

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
N/A	N/A	N/A	N/A

5. Principal officer title	6. Primary contact name
N/A	N/A

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
N/A	N/A	N/A	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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Spokane	WA	99207	Spokane, County	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Spokane	WA	99207	Spokane County	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts*** [illegible] certify that the information submitted in this application for a permit is complete and accurate to the best of my know[illegible]ment herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature of app[illegible]pied or stamped signatures) — Date of signature (mm/dd/yyyy): 08/09/2016

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 ea. (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: GPS Co-ord Lat. 27°40'48.41" South - City- Pongola, Magudu, South Africa, Long. 31°41'02.48 east - Kwazulu Natal Prov. Dist, elevation 1411 feet
   b. Date wildlife was hunted: 2016, May 7th Elephat shot, Safari Duration May 6-11, 2016
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): Skin, tusks, Feet, Tail, jaw - lower, ear

   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]:
   African San Taxidevmy
   Plaas Wag n' Bietjie
   Modderrivier 8700, 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 African San Taxidevmy
   Name: Address: ~~c/o Petro~~ Petro van der Linde, Operational Manager
   Address: Plaas Wag n' Bietjie
   City: Modderrivier
   State/Province: 8700, South Africa, Natal - Kwazulu 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, or [redacted] not be re-exported.

Applicant's signature: (b) (6) Date: 08/09/2016

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):

Bruce Barany
(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.

Greetings
USFW.
In discussion with the Owner/Operator of MkuzeFalls Game Reserve of how the hunting and trophy fees are allocated on support,maintenance and sustaining of the indigenous game population of elephant, lion, leopard and numerous plains game on their vast 200,000 hectacter naturalist preserve are as follows: of the approximately $10,000 US funds paid to the South African government for hunting licence and trophy fees, approximately $2500 goes towards the SA support of hunting programs management and maintenance of. The elephant trophy fee of $7.500-8.000 is used towards support of biological studies, habitat enhancement , poaching enforcement and related equipment needed and National Parks funding support.
Additionally, the daily rate fees paid to the 3 concessions involved in this safari helped to support over 100 members of the local Natal Region communities who assisted in support activities such as guides, trackers, skinners, cooks, drivers, guards and anti poaching personnel. Lastly, the local village next to the Mkuze Reserve benefitted and assisted in the butchering of this mature bull and according to the Guide this animal provided weeks of sustenance to the Families living there.

Sincerely,

(b) (6)

OMB Control #1018-0093 Expires: 05/31/2017

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA10493C-0

Effective: 11/21/2016 Expires: 11/20/2017

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:

BRUCE R. BARANY
(b) (6) [redacted]
SPOKANE, WA 99207
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. 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.

B. 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.**

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 South Africa 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 II export permit issued by the Management Authority of South Africa.

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires: 05/31/2017

RCVD JAN 30 2013

Federal Fish and Wildlife Permit Application Form

RCVD JAN 30 2013

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1 a. Last name	1 b. First name	1 c. Middle name or initial	1 d. Suffix
Barany	Bruce	R	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6 a. Telephone number	6 b. Alternate telephone number	6 c. Fax number	6 d. E-mail address
(b) (6)	(925) 417 5270	(925) 417 0170	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	1 b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4 a. Principal officer Last name	4 b. Principal officer First name	4 c. Principal officer Middle name/ initial	4 d. Suffix

5. Principal officer title	6. Primary contact name

7 a. Business telephone number	7 b. Alternate telephone number	7 c. Business fax number	7 d. Business e-mail address

C. All applicants complete address information

1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1 b. City	1 c. State	1 d. Zip code/Postal code	1 e. County/Province	1 f. Country
Spokane	WA	99207		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 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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue MA10493C-0 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

([signature]) Atty. In Fact for Bruce Barany 01/23/2018
Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 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 MA10493C-0 .

2. Submit the original permit with this application. ATTACHED

3. **Past activities.** N/A
   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:** 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

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

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: Atty. in Fact for Bruce Barany Date: 01/23/2018

   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):

   Hunter Int'l Brokerage Services, Inc.
   5674 Stoneridge Drive, Suite 209
   Pleasanton, CA 94588

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):

    Vanessa Tabugan
    Tel# (925) 417 5270 ext 104
    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.

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA10493C-0

Effective: 11/21/2016 Expires: 11/20/2017

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:

BRUCE R. BARANY
(b) (6) [redacted]
SPOKANE, WA 99207
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. 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.

B. 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.**

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 South Africa 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 II export permit issued by the Management Authority of South Africa.

C# 11538

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, Bruce Richard Barany
(Full legal name of individual)

residing at (b) (6) Spokane, WA 99207
(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, 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 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 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) Bruce Richard Barany

has caused these presents to be sealed and signed: (Signature) (b) (6)

(Capacity) _____ (Date) 10.19.2017

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)

(b) (6)

WA
USA
WASHINGTON
DRIVER LICENSE
4d LIC#
1 BARANY
2 BRUCE RICHARD
3 DOB
8
SPOKANE WA 99207-2124
4a Iss
4b Exp
12 Restrictions NONE
321701368D0945
(g) (g)

Status of 10493C RENEWAL and 26762C renewal

Brisendine, Amy <amy_brisendine@fws.gov>

Wed 9/30/2020 11:28 AM

To: Maria Felix <maria@b.hunter-international.net>
Cc: Brisendine, Amy <amy_brisendine@fws.gov>

Hi Maria,

Mary Cogliano asked me to get back to you regarding the status of these two applicaons. I apologiz e for the delay; they are under review. We appreciate your paence.

Best regards,

Amy Brisendine (Ac ng Chief, Branch of Permits)
U.S. Fish and Wildlife Service
Interna onal Affairs, Division of Management Authority
Branch of Permits
5275 Leesburg Pike, MS: IA; 2W062C
Falls Church, Virginia 22041
h ps://www.fws.gov/interna onal/permits/
h ps://www.cites.org

Please see our applica on forms that are available for on-line submission here: h ps://www.fws.gov/interna onal/permits/applica on-forms/index.html

Fw: [EXTERNAL] Fwd: PRT# MA10493C RENEWAL FOR BRUCE BARANY & PRT#MA26762C renewal for Robert Kiyosaki

Cogliano, Mary <mary_cogliano@fws.gov>
Wed 9/30/2020 11:06 AM
To: Brisendine, Amy <amy_brisendine@fws.gov>

Please see below.

Mary Cogliano, Ph.D.
Acting Chief, Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, Virginia, 22041-3803, USA
703-358-1991
USFWS | International Affairs

From: Maria Felix <maria@b.hunter-interna. onal.net>
Sent: Wednesday, September 30, 2020 1:00 AM
To: Cogliano, Mary <mary_cogliano@fws.gov>
Subject: Re: [EXTERNAL] Fwd: PRT# MA10493C RENEWAL FOR BRUCE BARANY & PRT#MA26762C renewal for Robert Kiyosaki

Hello Mary,

Just checking for news on these two applications. The one for Bruce Barany was a renewal.

Appreciate hearing from you.

Warm regards.

Maria Felix
Proud NRA & SCI Life Member
President/CEO
Hunter International Brokerage Services, Inc.

5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588
Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

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On Sun, May 17, 2020 at 3:15 PM Maria Felix <maria@b.hunter-international.net> wrote:

> Hi George,
>
> Hope all's well on your side. Not sure if you and your staff are back in the office now. Can you kindly advise renewal status of Bruce Barany (MA10493C-0 expired 11/20/2017) and Robert Kiyosaki's (MA26762C-0 expired 4/11/2018) elephant permits? Appreciate your usual prompt reply.
>
> Stay safe!

Maria Felix
Proud NRA & SCI Life Member
President/CEO
Hunter International Brokerage Services, Inc.

New Office Address:
5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588
Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

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On Thu, Feb 27, 2020 at 4:03 AM Villavicencio, Jorge <Jorge_Villavicencio@fws.gov> wrote:

> Please Ms. Felix,

There is no need to continue checking. These applications have not been forgotten. When the findings are made and finalized, either positive or negative, the requests will be completed. The applicant will be made aware at that time.

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
Jorge_Villavicencio@fws.gov

The U.S. Fish and Wildlife Service International Affairs Program works to conserve our nation's wildlife and species of international concern. In order to provide our best customer service, we are currently focusing on processing permit applications and are not providing status updates on permit applications at this time. Once you receive your acknowledgement e-mail indicating your application number, please allow us time to evaluate your application. If we need additional information, we will contact you.

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.

From: Maria Felix <maria@b.hunter-international.net>
Sent: Wednesday, February 26, 2020 8:32 PM
To: Cogliano, Mary <mary_cogliano@fws.gov>
Cc: Management Authority, FWHQ <ManagementAuthority@fws.gov>; Permits, FWHQ <permits@fws.gov>; Villavicencio, Jorge <Jorge_Villavicencio@fws.gov>; Lynn Javier <lynn@b.hunter-international.net>
Subject: Re: [EXTERNAL] Fwd: PRT# MA10493C/0 RENEWAL FOR BRUCE BARANY

Thank you Mary! I sincerely appreciate hearing from you. It's been a while.

I will check back with the permits team next month for update.

Respectfully,

Maria Felix
Proud NRA & SCI Life Member
President/CEO

Hunter International Brokerage Services, Inc.

New Office Address:

5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588

Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

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On Wed, Feb 26, 2020 at 3:15 PM Cogliano, Mary <mary_cogliano@fws.gov> wrote:

> Dear Ms. Felix,
>
> I just tried calling you but was unable to reach you. The application you've referenced is a request to renew a permit to import a trophy of an elephant taken in South Africa. Please be aware that on March 1, 2018, we withdrew our country-wide enhancement findings for elephants, and we now make our enhancement findings on an application-by-application basis. The original permit we issued for this import request was based on the country-wide finding that we later withdrew, and we must now make a separate enhancement finding on this permit renewal request.
>
> The application is currently under review. Due to the government lapse in appropriations in 2018, staff vacancies, and additional CITES and ESA listings, our office has a large back-log of permit applications, and I can't give you a definitive date of when this application will be processed. Feel free to check back with me at the end of March, and I will update you on our progress.
>
> Best regards,
>
> Mary Cogliano
>
> ---
>
> **From:** Maria Felix <maria@b.hunter-international.net>
> **Sent:** Tuesday, February 25, 2020 2:04 AM
> **To:** Management Authority, FWHQ <ManagementAuthority@fws.gov>; Permits, FWHQ <permits@fws.gov>

Cc: Villavicencio, Jorge <Jorge_Villavicencio@fws.gov>; Cogliano, Mary <mary_cogliano@fws.gov>; Lynn Javier <lynn@b.hunter-international.net>
Subject: Re: [EXTERNAL] Fwd: PRT# MA10493C/0 RENEWAL FOR BRUCE BARANY

We filed for **RENEWAL** of this 2016-2017 elephant permit in **January 2018** and have not had any update since April 2019 when we were told that the application is assigned to another biologist.

Can you kindly let us know when we can expect to receive this permit? I can send you a prepaid Fedex label if required.

Appreciate hearing from you.

Kind regards.

Maria Felix
Proud NRA & SCI Life Member
President/CEO

Hunter International Brokerage Services, Inc.

New Office Address:
5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588

Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

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On Mon, Apr 15, 2019 at 4:41 AM Management Authority, FWHQ <managementauthority@fws.gov> wrote:

> Hello Maria,
>
> Thank you for your inquiry.

This application has been received by our office and has been assigned to one of our Biologist. It is currently at a pending status. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

Respectfully,

U.S. Fish and Wildlife Service
International Affairs Program
Division of Management Authority
Branch of Permits
1-800-358-2104
Reply to: ManagementAuthority@fws.gov, http://www.fws.gov/international/permits/
***Sign up* for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**
Going abroad? Be Informed. Buy Informed.
****

Mailing address:
ATTN DIVISION OF MANAGEMENT AUTHORITY - BRANCH OF PERMITS
U.S. FISH & WILDLIFE SERVICE HEADQUARTERS
5275 LEESBURG PIKE, MS: IA
FALLS CHURCH, VA 22041-3803

On Tue, Apr 9, 2019 at 10:55 PM Maria Felix <maria@b.hunter-international.net> wrote:

> Please advise if this renewal application have been processed and when we can expect to receive the re-issued permit.
>
> Appreciate your prompt reply.
>
> Thank you.
>
> Maria Felix
> ***Proud NRA & SCI Life Member***
> President/CEO
>
> Hunter International Brokerage Services, Inc.
> 5700 Stoneridge Mall Road, Suite 260
> Pleasanton, CA 94588
> Tel (925) 417 5270
> Fax (925) 417 0170
> Email: maria@b.hunter-international.net
> Website: www.hunter-international.net

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

RCVD MAR 15 2017

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Lloyd	George	Harold	II

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		N/A

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)		N/A	(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Weimar	Texas	78962	Colorado	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
Same

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 09US206803/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 3/10/2017

Signature of a[illegible]nit (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: 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: South Africa, Limpopo Province, Maramani Conservancy, closest town is Musina and closest Village Malale

   b. Date wildlife is to be hunted: May-June 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, Bones, Tusks, and worked, manufactured, or handicraft items.

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 SPLITTING IMAGE TAXIDERMY
Name: Address:
Address: The Badger Bldg., 14 Uitenhage Rd., Sydenham
City: Port Elizabeth
State/Province: Eastern Cape
Country, Postal Code: South Africa, 6057

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 letter

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 into the United States, cannot be re-exported.

Applicant's signature: (b) (6) Date: 3/10/2017

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).

will use Houston, Texas port

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):

George H. Lloyd (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.

George H. Lloyd II
(b) (6)
Weimar, Texas 78962

March 10, 2017

RE: Form 3-200-19 Question Number 5

To Whom It May Concern;

I will be hunting a trophy elephant in the Republic of South Africa Limpopo Province May and June of 2017. Twenty percent of my permit/trophy fee will be paid directly to the government for use in their wildlife management and conservation. In addition 20 local staff are employed in the hunting camp by my other fees paid to the outfitter. Finally all the meat from the hunted elephant go directly to the people of the Malale Village. All of these actions contribute to the sustainable conservation of the elephant population in this area.

Respectfully,

(b) (6)

George H. Lloyd II

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA26676C-0

Effective: 09/19/2017 Expires: 09/18/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Ceglians
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

GEORGE HAROLD LLYOD II
(b) (6) [redacted]
WEIMAR, TX 78962
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

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), 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. 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 South Africa.

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).

OCT - 6 2017

George Harold Lloyd II
(b) (6)
Weimar, TX 78962
Phone: (b) (6)
Email: (b) (6)

October 2, 2017

RE: Permit Number MA26676C-O

Tim Mac Donald
Legal Instrument Examiner
Division of Management Authority
Branch of Permits; MS: IA
US Fish and Wildlife Services
5275 Leesburg Pike
Falls Church, VA 22041-3805

Dear Mr. Mac Donald,

As requested in the email find attached a completed form 3-200-52 and the original issued permit number MA26676C-O. It is my understanding that the correction to my last name will be made and the permit will be reissued ASAP. As a result of the departments misspelling error on the original permit there will be no fee required for the reissue. If anything further is needed please contact me immediately.

Thanks for your assistance in this matter.

(b) (6)

George Harold Lloyd II

Attached: Form 3-200-52, Permit, email dated 10/2/2017

OCT - 6 2017

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Lloyd	George	Harold	II

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			N/A

6.a. Alternate telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)		N/A	(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Weimar	Texas	78962	Colorado	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 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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA266760-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50,*** and I certify that the information submitted in this application for a permit is complete and accurate to the best of my [redacted] false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 10/2/2017

Signature ([redacted]) for permit (No photocopied or stamped signatures) 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 MA266760-0

2. Submit the original permit with this application. Attached

3. **Past activities.**
   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit. N/A
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.
   Correct misspelled last name

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:** 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

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: N/A

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. Correct spelling of last name

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: (b) (6) Date: 10/2/2017

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):

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.

☐ 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.

N/A

11. Who should we contact if we have questions about the application? (Include name, phone number, and email): George H. Lloyd II
(b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Permit Number: MA26676C-
Effective: 09/19/2017 Expires: 09/18/201

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 Ceglarek
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
GEORGE HAROLD LLYOD II
(b) (6) [redacted]
WEIMAR, TX 78962
U.S.A.

Original, Unused Permit Returned

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

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), 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. 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 South Africa.

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).

From: MacDonald, Tim
Sent: Monday, October 2, 2017 10:03 AM
To: Mary Beth Lloyd
Subject: Re: Permit #: MA26676C-O

George,

I am sorry about the mistake. Please return the original permit to my attention along with a completed application form 3-200-52 and I will make the correct for you as quickly as possible.

(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***

On Mon, Oct 2, 2017 at 10:25 AM, Mary Beth Lloyd <(b) (6) [redacted] wrote:

> Mr. MacDonald,
>
> First I want to thank you and the department for your assistance in responding to my request for an import permit on elephant from South Africa which I received just last week. However there is a problem which must be addressed by the department. You will note that the permit issued to me has my last name misspelled (see attached permit # MA26676C-O). As submitted in my application on March 10, 2017 (see attached permit app #26676C) the correct spelling of my last name is LLOYD not LLYOD. This error will present a problem with my export from South Africa and the import to the US. All the required paperwork I have executed to date for the permit and transport must match my passport

identification and other identification that is required for this process. Please correct this error and reissue the import permit immediately.

Thanks for your assistance in this matter.

George Harold Lloyd II

Sent from Mail for Windows 10

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA26676C-1

Effective: 12/15/2017 Expires: 12/15/2018

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:

GEORGE HAROLD LLOYD II
(b) (6) [redacted]
WEIMAR, TX 78962
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

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), 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. 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 South Africa.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-52

OMB Control No. 1018-0093
Expires 08/31/2020

JAN 2 8 2019

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Lloyd	George	Harold	II

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number
(b)(6)	(b)(6)	(b)(6)

(b)(6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Weimar	Texas	78962	Colorado	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

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best [redacted] belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

12/15/2018

Signature of applicant/Princ[redacted] (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

   N/A

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?
   George H. Lloyd II Phone: (b)(6)
   email: [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

   N/A

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA26676C-1

5. Submit the original permit with this application.

   Attached

OMB Control No. 1018-0093
Expires 08/31/2020

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. Attached

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

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. N/A

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: (b) (6) Date: 12/15/2018

b. For **CHANGES** to original application: N/A

On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

ELEPHANT IMPORT FROM SOUTH AFRIC

Permit Number: MA26676C-

Effective: 12/15/2017 Expires: 12/15/201

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:

GEORGE HAROLD LLOYD II
(b)(6) [redacted]
WEIMAR, TX 78962
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

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), 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. 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 South Africa.

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).

George H. Lloyd II
(b)(6)
Weimer, Texas 78962

Department Of Interior
U. S. Fish and Wildlife Services
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

To Whom It May Concern:

In May of 2017, I legally hunted and successfully harvested a trophy elephant in the Limpopo province of South Africa. After applying to your office for a CITES Import Permit one was issued effective 12/15/2017. That permit is number MA26676C-1 which expired on 12/15/2018 and is attached as requested.

I am requesting a renewal of that permit as a result of numerous delays by the African Outfitter and the South African Government, all of which were beyond my control. Only in December of 2018 did the elephant's remains, which were harvested in 2017, finely reach the control of an authorized Taxidermy/Export Agent. They are being held in a secure area for my further direction and the renewal of the CITES Import Permit.

Your attention to this matter is greatly appreciated.

Regards,

(b) (6)

George H. Lloyd II

Form 3-200-20

RCVD NOV 19 2018

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
ELLISON	GARY	EUGENE	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number
(b)(6)	(b)(6)	(b)(6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
HOUSTON	TEXAS	77079	HARRIS	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

CAB ATTY IN FACT 10/29/18

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   PRO CARGO USA 15619 MORALES ROAD HOUSTON, TEXAS 77032 SELF ADDRESSED ENVELOPE ENCLOSED

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   CINDI RULON CINDI.RULON@PROCAROGUSA.COM 281-220-3176

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
      LOXODANTA AFRICANA AFRICAN ELEPHANT SKIN, FEET, EARS AND TRUNK

   b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:
      WESTERN KAVANGO REGION, MANGETTI CONSERVANCEY OTJIWARONGO NAMIBIA

   b. Date wildlife was hunted:
      SEPTEMBER 2011

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

Professional hunter C. Britz
Safari Company Western Kavango and mangetti

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

Taxidermy Studio
8 Bahnhof street
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. If you are applying to import a 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: C. Britz
Address: P.O. Box 1179
City: Otjiwarongo, namibia
State/Province:
Country, Postal Code:

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

No additional impact on the specie was or is created from the hunt covered in this application as the tusks and tail were imported under the attached 3177 in 2012 ,Since1975 the elephant population has increased by an average of 4.5% per year.. 1975 population was 7,500 and 2017 population was over 22,700. Therefore population was stable and increasing in 2011.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

MY HUNT PROVIDED FOOD FOR THE LOCAL VILLAGERS. THERE WERE AT LEAST 60 PEOPLE FROM 5 LOCAL VILLAGES THAT CAME AND HELPED CUT UP AND DISTRIBUTE THE MEAT. THE MEAT FROM HUNTS IS LIKELY THE ONLY SOURCE OF PROTEIN THESE VILLAGERS MAY HAVE. MEMBERS OF THE LOCAL COMMUNITY ARE EMPLOYED BY THE HUNTING OPERATORS AS GUIDES, TRACKERS, SKINNERS, COOKS, DRIVERS AND LODGE EMPLOYEES

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

MY HUNT FEES OF APPROXIMAATELY $18,000 WERE USED TO MAINTAIN THE PARK, WHICH INCLUDES MAINTAINING THE BOUNDARIES TO PREVENT POACHING. THIS PROTECTS THE WILDLIFE AND THE WORKERS. THERE WERE AT LEAST 4 PARK OFFICIALS INVOLVED WITH OVERSEEING THIS HUNT AND VARIOUS OTHERS BEING PAID TO PROTECT THE WILDLIFE. TUSKS AND TAIL IMPORTED IN 2012 NO ADDITIONAL IMPACT ON POPULATION CREATED.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: [signature] CAB ATTY IN FACT Date: 10/29/18

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 an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

October 13, 2018

USFWS

DMA

5275 Leesburg Pike

Falls Church, VA. 22041

RE; Elephant Import information—Tusks and tail previously imported in 2012

Dear Permit Office,

I am adding this letter to clarify that I previously imported my hunting trophy elephant tusks and tail in 2012. I am now ready to import the tanned elephant skin, ears, truck and feet. My FWS declaration for the elephant tusks and tail already imported in 2012 is attached to this application.

Please contact me if there are any questions.

(b) (6)

Gary E. Ellison

(b)(6)

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

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.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b)(6)

Cell Phone (b)(6)

Email address: (b)(6)

x Individual

KNOW ALL MEN BY THESE PRESENTS: That x Gary E. Ellison (Full Name of Person), residing at x (b)(6) hereby constitutes and appoints each of the following persons - John Rulon CHB

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, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize 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 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 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 John Rulon CHB , who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

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 I 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

(Print name) x Gary E. Ellison

has caused these

(Signature) x (b) (6)

((Date) x Sept 13, 2018

RCVD APR 10 2019

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
CUPPETILLI	MARK	VICTOR	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6) [redacted]			cindi.rulon@procargousa.com

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
NEW BRAUNFELS	TEXAS	78132	COMAL	U.S.A.
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

J Rulon atty in fact 04/08/2019

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for a trophy that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   PRO CARGO USA ATTN CINDI RULON SELF ADDRESSED FEDEX ENVELOPE ENCLOSED
   15619 MORALES ROAD HOUSTON, TEXAS 77032

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   CINDI RULON PRO CARGO USA 281-220-3176 CINDI.RULON@PROCARGOUSA.COM

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      LOXODANTA 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 information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife was removed from the wild:

      MUNYAMADZI GAME MANAGMEMENT AREA IN THE NYAMPALA HUNTING BLOCK
      GPS SOUTH 12.24148 EAST 31.76574

   b. Date wildlife was hunted:

      SEPTEMBER 8, 2018

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

BAOBAB SAFARI PROFESSIONAL HUNTER AHMED PATEL

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

BRIDGE SHIPPING ZAMBIA PLOT 39375/M KABWE HIGHWAY ROAD NEW INDUSTRIAL AREA NDOLA ZAMBIA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). ATTACHED

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	
Business Name:	BRIDGE SHIPPING
Address:	PLOT 39375M KABWE HIGHWAY ROAD
City:	NDOLA
State/Province:	ZAMBIA
Country, Postal Code:	

9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

SEE ATTACHED OPERATOR ENHANCEMENT QUESTIONNAIRE

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?

SEE ATTACHED OPERATOR ENHANCEMENT QUESTIONNAIRE

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

IN ADDITION TO THE ATTACHED OPERATOR ENHANCEMENT QUESTIONNAIRE, PLEASE SEE THE PICTURES SHOWING THE MEAT DISTRIBUTION OF THE ELEPANT MORE THAN 200 VILLAGERS RECEIVED MEAT FROM THE HUNT AS WELL AS OUTHER BENEFITS FROM THE HUNTING OPERATION.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or ~~taxidermist~~ applying on behalf of a U.S. hunter or ~~foreign national~~, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: [signature] Date: 04/08/2019

11. If you are the hunter applying to import your own trophy, please read and sign the following statement:

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign governments to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Original

NPW FORM 2

S/No. 0001589

REPUBLIC OF ZAMBIA
Zambia Wildlife Act, 2015
(No. 14 of 2015)

THE ZAMBIA WILDLIFE
(Licences and Fees) Regulations, 2007
(Regulations 3 (2))

HUNTING LICENCE - NON RESIDENT

Station of Issue: Chilanga Date of Issue: 23/08/2018

DETAILS OF LICENSEE

Full Name: MARC CUPPERELLI NRC No./Passport No.:

Nationality: Age:

Tel/Mobile No: E-mail:

Full Name of Safari Company: Bachelor Safaris

Certificate of Incorporation No.: Date of Incorporation:

Postal Address: Lusaka 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 US$*
Elephant	1st	M	Nyampala 0000128 0043591	2018	

Total Animals fees paid - the kwacha equivalent of US$.....

Concession Fees paid - the kwacha equivalent of US$.....

Grand Total - the kwacha equivalent of US$.....

MINISTRY OF TOURISM AND ARTS
DEPARTMENT OF NATIONAL PARKS AND WILDLIFE
23 AUG 2018
LICENSING
PRIVATE BAG 1 CHILANGA, ZAMBIA.

Official Stamp

Chairperson of the Committee

*Note: Original copy to Licensee ***Duplicate to Accounts***Triplicate to Commercial*** Quadruplicate to be retained in the book*

NPW FORM 12

ORIGINAL

0001809
S/No.....

REPUBLIC OF ZAMBIA

The Zambia Wildlife Act

(No. 14 of 2015)

(Licences and Fees) Regulations, 2007

(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: AHMED PATEL NRC/Passport No.: 39 579740/11/1

Residential Address: PLOT 396 A MANCHU RD LUSAKA

Name of Safari Company on behalf of which the Professional Hunter is submitting this return: KAOBAB SAFARIS

DETAILS OF CLIENT

Name of client: MARK CUPPETELLI NRC/Passport No.: (b) (6) [redacted]

Tel/Mobile No..... Nationality:.....

Postal Address..... Residential Address.....

Type of Licence: G.M.A PERMIT Licence No.: 000112.6

Date of Issue: 27-08-18 Place of Issue CHILANGA

Name of Hunting Block where hunting was conducted: NYAMPALA

Hunting period From: ~~14~~ 01-09-18 To: 14-09-18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export Yes	Trophy for export No	Foreign currency value charged to client
01-09-18	HIPPO	M	ONE	NIL	S11.44263 E32.20113			0001648
05-09-18	CROCODILE	M	ONE	NIL	S12.65439 E32.07345			0001649
08-09-18	ELEPHANT	M	ONE	NIL	S12.24148 E31.76574			0001589
10-09-18	2ND HIPPO	M	ONE	NIL	S12.68438 E32.07345			0001571

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
HIPPO		24"		
CROCODILE	390 cm			
ELEPHANT		R 179 cm L 174.5 cm	R 32.15 L 32.40	
HIPPO		25"		

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the total foreign currency stated above is the full amount paid by the client for the hunt.

Date 12-09-18 Signature of Client (b) (6) [redacted]

Date 12-09-18 Signature of Professional Hunter.....

Date 12-09-18 Name of Wildlife Police Officer Robby Mwansa

Employment No. of W.P.O. CRB

Signature of W.P.O.....

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

WAITING FOR MEAT DISTRIBUTION...

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

1. Name of area operator: **Baobab Safaris Limited**

   a. Years in business: **35 Years**

   b. Name of company conducting hunt: **Baobab Safaris Limited**

2. Name of concession: **Nyampala Hunting block (Munyamadzi G.M.A)** Size in km²: **2185**

   a. Land tenure: **Government and community lease**

   b. Length of concession agreement: **7 Years** Can it be renewed? **Yes**

   c. Length of renewal, if applicable: **Unclear at this time**

   d. Estimated total amount received in trophy fees last year, if applicable: **$200,000.00**

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:

Over and above the obligatory concession fees paid to the Government and Local Community, Baobab Safaris Limited spends an additional $60,000.00 Annually for the below mentioned activities:

- **Infrastructure Development pledge annually**
- **Resource Monitoring pledge annually**
- **Community development pledge annually**
- **Law enforcement pledge annually**
- **Fire management pledge annually**
- **Annual Evaluation of compliance by hunting outfitter**

These funds where used for the following activities:

- **Purchase a new Land Cruiser pick up for community use as well as Anti Poaching use.**
- **Two students from the community are currently in college studying Tourism funded directly by the safaris outfitter.**
- **Community is directly paying bursaries for 19 students from these funds.**
- **The construction of 12 brand new Scout houses, 6 at Kalimba and 6 at Mayembe to assist with Law Enforcement in those areas.**
- **Purchase of computer and printing equipment for Kanele wildlife headquarters in the area as while as Community resource board offices.**
- **Purchase of 4 shotguns for Anti poaching patrols.**
- **Funds were also used for delivery of 70% meat to all areas of the blocks.**
- **Repairing the NTUNTA-NABWALYA Road as access to the areas is completely restricted during the rainy season.**

Airstrip cleaning crews	15	15 locals

7. Number of staff employed in the off-season: **37**

   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	31	31 locals employed by Community Resource Board	All year
Managers	Nil	-	-
Maintenance	4	4 locals	All year
Road opening/construction	Nil	-	-
Community relations personnel	2	2 locals	All year
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: **63 community scouts Employed by Community Resource Board, supported by 2 hunting operators that operate the 2 hunting concessions within this Game management Area, also supported by Frankfurt Zoological Society and Department of National Parks and Wildlife.**

   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 round**

   d. Number of anti-poaching patrols per month: **10 long patrols, 6 short patrols and 20 day patrols.**

   e. Description of anti-poaching equipment, vehicles, etc.: **Spotter planes (FZS), Vehicles, Rifles, camping equipment, communication equipment, bicycles, uniforms, boots and rain coats.**

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **The Department of National Parks and Wildlife principle ranger based at Kanele headquarters.**

   g. Do you offer rewards to poaching informants leading to arrest? **Yes**

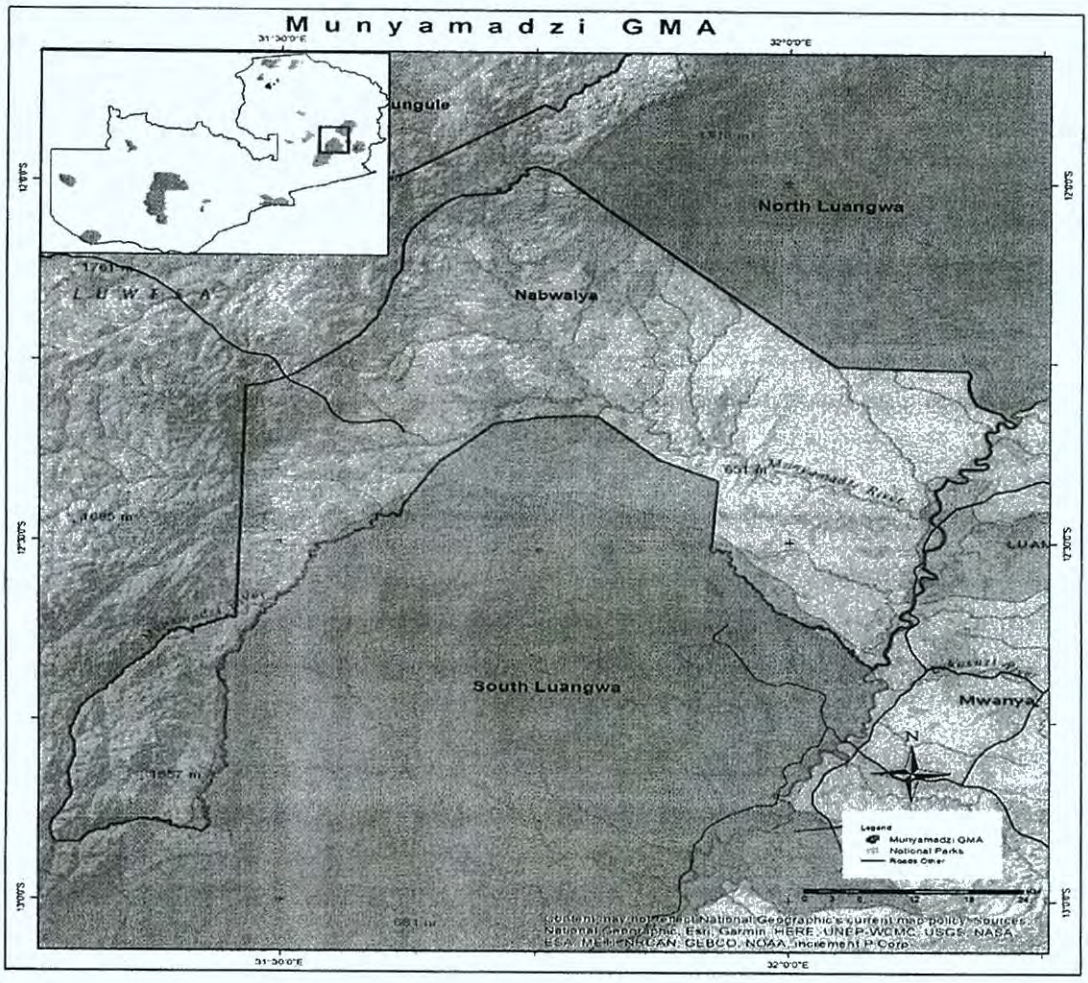
   h. Do you offer rewards to poaching informants upon conviction? **Yes**

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **US$**

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

- **Building and refurbishing of schools, clinics, teachers houses, mothers shelters, a guest house, repairing and drilling of new boreholes.**

f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: **In Between Luambe, South Luangwa and North Luangwa**



g. If the concession borders a national park, please provide the park name: **South Luangwa National Park, Luambe National Park and North Luangwa National Park.**

h. Description of general and distinctive habitat features and any water features:

The water features are: Luangwa River, Munyamadzi River, Mupamandzi River and Mutinondo River.

The Habitat features are: Mopani Woodland, Semi Savanna, Miombo Woodlands and Riverine Bush.

3. Are there any communities living in the concession? **Yes**

   a. If so, estimated number of people or villages in the concession? **14,220 under 105 Headmen and one chief.**

4. Are there communities bordering this concession? **Yes**

   a. If so, estimated number of people or villages around the concession? **The bordering areas are also Game Management areas and they have their own conservation plans in place.**

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	Dense	± 3,000	Up	-Regular aerial patrols by Frankfurt Zoological Society and daily sighting by operator. - Patrol records from scouts
Lion	Dense	± 85	Up	-Camera trap footage; -Shared information with Zambia Carnivore Project, conservation South Luangwa, Frankfurt Zoological Society. -Daily sightings -Data recorded on patrols.
Leopard	Dense	± 120	Up	-Camera trap footage. - Shared information with Zambia Carnivore Project, Conservation South Luangwa,

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

				Frankfurt Zoological Society -Daily Sighting -Data recorded on patrols
Prey species				
- Buffalo	Dense	± 2,500	Up	- Regular aerial patrols. - Data collected by scouts - Daily sightings by outfitter.
- Bushbuck	Dense	± 350	Up	
- Bushpig	Average	± 200	Up	
- Crocodile	Dense	± 1,000	Up	
- Duiker C	Average	± 100	Stable	
- Eland	Sparse	± 150	Stable	
- Grysbok	Average	± 80	Stable	
- Hartebeest	Sparse	± 80	Stable	
- Hippopotamus	Dense	± 5,000	Up	
- Hyena	Average	± 250	Up	
- Impala	Dense	± 8,000	Up	
- Klipspringer	Sparse	±50	Stable	
- Kudu	Average	± 250	Stable	
- Puku	Average	± 1,000	Up	
- Reedbuck	Sparse	± 50	Stable	
- Roan Antelope	Sparse	± 150	Stable	
- Warthog	Dense	± 1,000	Up	
- Waterbuck C	Average	± 250	Up	
- Wildebeest C	Dense	± 1,250	Up	
- Zebra	Dense	± 3,000	Up	

6. Total employment number: **82**

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	3	3 Zambian Citizens
Trackers	6	6 locals
Anti-poaching scouts/rangers	31	31 locals employed by Community Resource Board funded by hunting operations
Other anti-poaching	6	Wildlife Offices under D.N.P.W
Cooks/housekeepers	6	6 locals
Community coordinators	3	3 community
Managers	2	Not local
Biologists	2	Employed by the Department of National Parks and Wildlife
Others: Road cleaning crews	15	15 locals

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	$18,600.00	$18,600.00	$18,600.00	
Equipment	$4,000.00	$3,000.00	$3,000.00	
Vehicles	-	$25,000.00	$25,000.00	
Petrol	$4,000.00	$4,000.00	$4,000.00	
Rewards paid	$3,500.00	$3,250.00	$3,750.00	
Other: Fire management	$2,500.00	$2,500.00	$2,500.00	
Other: Infrastructure	$10,000.00	$,10,000.00	$10,000.00	
Community development	$17,400.00	-	-	
Totals	**$60,000**	**$66,350.00**	**$66,850.00**	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	32	28	23	
Elephant carcasses observed	9	7	2	
Lion carcasses observed	4	2	-	
Leopard carcasses observed	-	-	1	
Ivory poachers arrested	3	1	-	
Meat poachers arrested	45	30	22	
Other poachers arrested	30	20	14	
Poachers convicted	31	29	27	
Snares/gin traps collected	150	60	24	
Firearms confiscated	26	20	14	
Vehicles confiscated	-	-	-	
Bicycles confiscated	18	12	6	
Boats/nets confiscated	24 nets	15 nets	12 nets	
Tusks recovered	8 pairs	5 pairs	2 Pairs	
Other: _ _____				

10. Community investment:[3]

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 (e.g., required by law, required by contract, voluntary contribution)?

- **As required by law and contract, 20% of concession fees goes directly to the community and 80% goes to the Department of National Parks and Wildlife.**

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

- **Over and above this, the company pays $60,000.00 to the community/Department of National Parks and Wildlife for infrastructure development for law enforcement, resource protection, fire management and community development.**
- **Trophy fees are shared between the government and local community on a 50/50 share basis. 50% of the money goes direct to the community for community projects annually.**
- **Voluntary donations are also provided such as solar powered street lights to wildlife camps for security purposes.**

c. Does the company provide game meat to nearby communities? **Yes**

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: **Over 70% of meat was delivered free of any charges totalling approximately 33,990 kgs calculated at $5 per kg equates to the value of $169,950.00**

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. **This is mainly done in the off season when crops are in the fields by the Department of National Parks and Wildlife, community scouts using funds provide by the safaris outfitter.**

- **Chilli fences are erected**
- **Chilli bombs**
- **Chilli blocks are made**
- **Beehives are put around the crops.**
- **Fireworks are procured and distributed to all Village Area Groups (VAGs).**
- **PAC hunts are conducted if the outfitter is called upon to assist, but are usually done by D.N.P.W.**

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **Maize is bought and given to the local residents so that they can survive through the difficult dry season.**

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	Maize	450 x 50kg bags of maize grain provided for elephant damage as well as drought relief.	500 x 50kg bags of maize grain is provided for elephant damage as well as drought relief.	500 x 50kg bags of maize grain is provided for elephant damage as well as drought relief.
Lion	NIL	-	-	-
Leopard	Nil	-	-	-
Crocodile	6 people killed	2 people killed. Funeral expenses paid	2 people killed Funeral expenses paid	3 people killed Funeral expenses paid
Hippo	1 person killed	1 person killed	-	-

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **Dollars**

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	1 school built	1 school built	2 schools built	
Education (e.g., school fees, supplies)	Paying bursaries for 19 students in college and 2 in university	Paying bursaries for 19 students in college and 2 in university	Paying bursaries for 19 students in college and 2 in university	
Health (e.g., clinics, offices)	Providing fuel and maintenance for the ambulance	Providing fuel and maintenance for the ambulance	Providing fuel and maintenance for the ambulance	
Health (e.g., medical salaries, equipment)	-Construction of mothers shelter at local clinic - Purchase of medicines to the clinics when required.	- Construction of mothers shelter at local clinic - Purchase of medicines to the clinics when required	- Construction of mothers shelter at local clinic - Purchase of medicines to the clinics when required	
Community scout salaries	$18,600.00	$18,600.00	$18,600.00	
Other community anti-poaching	Drama clubs funded and sensitisation of villagers to the benefits of conservation	Drama clubs funded and sensitisation of villagers to the benefits of conservation	Drama clubs funded and sensitisation of villagers to the benefits of conservation	
Local government activities	- Honey production training. - Conservation farming training. - Guest house construction. -Dugout canoes procured for crossing rivers in wet season. - Quarterly meetings.	-Quarterly meetings held. - Access Road clearing. - Conservation farming training. -Dugout canoes procured for crossing rivers in wet season.	-Quarterly meetings held. - Access Road clearing - Conservation farming training. - Guest house Construction. -Dugout canoes procured for crossing rivers in wet season.	
Water infrastructure improvements	Repairing 4 borehole pumps.	Drill 1 borehole at Chilima scout camp.	Drill 2 boreholes.	

Sports teams funded	**Soccer clubs funded.**	**Soccer clubs funded**	**Soccer clubs funded.**	
Construction materials donated	**Cement, roofing sheets, paints and block making moulds provided.**	**Cement, roofing sheets, paints and block making moulds provided.**	**Cement, roofing sheets, paints and block making moulds provided.**	
Other: _____	**Subsistence allowance during court seasons for sustenance.**	**Subsistence allowance during court seasons**	**Subsistence allowance during court seasons**	
Other: _____	**-Salaries paid for 25 community Teachers. -Construction of a guest house for the community Resource Board income, the guest house has 30 beds.**	**Salaries paid for 25 community Teachers.**	**Salaries paid for 25 community Teachers.**	
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	**Hunting lion**	**Hunting leopard**	**Hunting all species**
Number of U.S. clients	**2015: Nil 2016: 1 2017: Nil**	**2015: Nil 2016: 1 2017: 2**	**2015: 2 2016: 1 2017: 4**	**2015: 5 2016: 5 2017: 9**
Percentage of U.S. clients	**2015: Nil 2016: 100% 2017: Nil**	**2015: Nil 2016: 100% 2017: 100%**	**2015: 75% 2016: 25% 2017: 100%**	**2015: 45% 2016: 45% 2017: 85%**
Trophy fees paid by U.S. clients	**2015: Nil 2016: $15,000.00 2017: Nil**	**2015: Nil 2016: $15,000.00 2017: $30,000.00**	**2015: $14,000.00 2016: $7,000.00 2017: $28,000.00**	**2015: $67,500.00 2016: $67,500.00 2017: $121,000.00**

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:

65% Americans through the 3 year period.

$350,000.00 in trophy fees alone for the 3 year period.

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

- **Baobab Safaris Ltd has made it mandatory for all its professional hunters to take available online refresher training courses for aging predators to keep them abreast with international standards on aging Lions and Leopards.**
- **The outfit has also been following an age based off take approach since the re-introduction of Lion and Leopard trophy hunting in Zambia, the company has cited 7 years as the benchmark for the minimum age of cats to be harvested. The company also insists that the professional hunters be very conservative when estimating ages of cats to be hunted, as a result many cats are passed up before the correct speciment that meets the criteria is found.**
- **It is company policy to harvest mature males from different zones of the hunting block rather than from the same parts of the hunting areas.**
- **From 2015 to date, 10 boreholes have been serviced and drilled to provide clean drinking water.**
- **Construction is at the planning stages for another safari camp to be built in the area that is meant to be used for used for consumptive and non-consumptive tourism activities, as a means of Job Creation and Increased Revenue for all Stakeholders.**
- **Sensitising community members particularly at grass root level of the benefits of Safari hunting and conservation.**
- **Every year the community endeavours to select and train between 5 and 10 new wildlife scouts that are employed within the Munyamadzi Corridor and North Luangwa conservation project area that this G.M.A is part of.**
- **Land use plans and general management plans are currently being finalised for the G.M.A, this is to reduce habitant loss, to avoid silting of the rivers, to reduce human - animal conflicts.**
- **Zambia Carnivore programme and Frankfurt Zoological Society have got Lions, Wild dogs and Elephants collared that roam these areas and data sharing of sightings and pictures from camera traps as well as conventional cameras are shared by our professional hunters, this data sharing is proving to be useful to the success of these research projects.**

14. I declare that the foregoing is true and correct.

Signature: (b) (6) [redacted]

Name: RASHID RADDERA Title: DIRECTOR

John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

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.

U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b) (6) [redacted]

Cell Phone (b) (6) [redacted]

Email address: (b) (6) [redacted]

x Individual

KNOW ALL MEN BY THESE PRESENTS: That, x MARK VICTOR CUPPETILLI (Full Name of Person), residing at x (b) (6) [redacted] NEW BRAUNFELS, TEXAS hereby constitutes and appoints each of the following persons - John Rulon CHB

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, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize 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 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 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 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 John Rulon CHB , who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

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 I 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

IN WITNESS WHERE OF, the said (Print name) x MARK VICTOR CUPPETILLI **has caused these presents to be sealed and signed:**

(Signature) x (b) (6) [redacted]

((Date) x 8/16/18

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
13US88593A/9

2. Valid
10/31/2013

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b)(6)
LEONARD, MI 48367
U.S.A.

4. Consignee (name and address, country)
GERARD PASANISI SAFARI
P.O. BOX 21880
DAR ES SALAAM
TANZANIA

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 AMENDS AND REPLACES 12US88593A/9 ISSUED 11/01/2012.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-3247

-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

09/12/2013
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 ELEPHANT Scientific Name: LOXODONTA AFRICANA	9. 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 NO 12. Country of Origin TANZANIA
B. 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 TANZANIA
C. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
D. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
E. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]

513437

13US88593A/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.

09/12/2013
Date

U.S. CITES
Management Authority

Chief, Branch of Permits
Division of Management Authority

513416

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
14US88593A/9

2. Valid
09/16/2015

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b)(6)
LEONARD, MI 48367
U.S.A.

4. Consignee (name and address, country)
GERARD PASANISI SAFARI
P.O. BOX 21880
DAR ES SALAAM
TANZANIA

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.

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

-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.

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 / 11. Quantity (including units) / 12. Country of Origin
A. Common Name: AFRICAN ELEPHANT Scientific Name: LOXODONTA AFRICANA	9. 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 NO 12. Country of Origin TANZANIA
B. 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 TANZANIA
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

478614

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.

U.S. CITES Management Authority

09/17/2014
Date

Chief, Branch of Permits
Division of Management Authority

478619

Department of the Interior
U.S. Fish and Wildlife Service

Expires 11/30/2010
OMB No. 1018-0093

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	1 b. First name	1 c. Middle name or initial	1 d. Suffix
Rondeau	Catherine	Hammond	Mrs

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b)(6)			

6 a. Telephone number	6 b. Alternate telephone number	6 c. Fax number
(b)(6)		

B. Complete if applying on behalf of a business, corporation, public agency or institution

1 a. Name of business, agency, or institution	1 b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, or institution

4 a. Principal officer Last 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)(6)				
1 b. City	**1 c. State**	**1 d. Zip code/Postal code**	**1 e. County/Province**	**1 f. Country**
Leonard	MI	48367	Oakland County	USA

2 a. Mailing Address (include if different than physical address, include name of contact person if applicable)				
(b)(6)				
2 b. City	**2 c. State**	**2 d. Zip code/Postal code**	**2 e. County/Province**	**2 f. Country**
Oakland	MI	48363	Oakland County	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** Federal, tribal, State, and local government agencies and those acting on behalf of 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? 10US25986A/9 I had and used
Yes ☒ If yes, list the number of the most current permit you have held ~~or that you are applying to renew/reissue:~~
No ☐ a permit in 2010 for an elephant + another in 2010 for a leopard.

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 may subject me to the criminal penalties of 18 U.S.C. 1001

(b) (6) 9-12-2012

Signature (Wet-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 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. NO NO

I am requesting a new elephant a new leopard permit for

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.

nei use

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: 1 (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: 0 (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: Tanzania's Selous Reserve
   b. Date wildlife is to be hunted: Nov. 2 - 24, 2012
   c. Description of the trophy and/or parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn): Leopard = full body skin with claws, skull, teeth. Elephant = 2 tusks, 2 ears, 4 feet, 1 trunk, tail with ha
3. **IF THE ANIMAL IS DEAD**, please enter the following: full body skin, four teeth
   a. Country and place (area, region, or ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
   b. Date wildlife was hunted:
   c. Description and size of the trophy and/or parts (e.g., skin, skull, shoulder mount, life size mount, claws, horn):
   d. The current location of the trophy (address and country):
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: Tanganyika Wildlife Safari

Address: Uhuru Street, Plot-38, near Buguruni Police Post

City/Country: P.O. Box 21880 Buguruni Kisiwani, Dar-es-Salaam, Tazania, Eas Afri

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: (b) (6) [redacted] Date: 9-12-12

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 X (provide a copy of the approval(s)) Have applied Not required ☐
   The outfitter in Tanzania is holding my hunting license on my behalf

9. Enter the U.S. port through which the [export/re-export/import] will occur. New York City
   (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. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/pdf/...)

10. Address where you wish permit mailed (if different than page 1):
    (b)(6) [redacted] Oakland, MI 48363, USA
    (same as on page 1)

11. If you wish the permit to be sent to you by means other than regular mail, provide an air bill, pre-paid envelope, or billing information:
    N/A

12. Who should we contact if we have questions about the application? (Include name, phone number, e-mail)
    Catherine Rondeau (b)(6) [redacted]
    (b)(6) [redacted]

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
12US88593A/9

2. Valid until
10/31/2013

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b)(6)
LEONARD, MI 48367
U.S.A

4. Consignee (name and address, country)
TANGYANIKA WILDLIFE SAFARI
UHURU STREET, PLOT 38
NEAR BUGURUNI POLICE POST, P.O. BOX 21880
BUGURUNI KISIWANI
DAR ES SALAAM
TANZANIA

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.

5a. Purpose of Transaction
H

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U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-3247

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.

11/01/2012
Issuing Date

US 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 ELEPHANT Scientific Name LOXODONTA AFRICANA	9. 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 NO 12. Country of Origin TANZANIA
B. 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 TANZANIA
C. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
D. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
E. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]

371235 USDS 11/1/12 GS

12US88593A/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.

11/01/2012
Date

U.S. CITES
Management Authority

Chief, Branch of Permits
Division of Management Authority

371236

United States Department of the Interior
FISH AND WILDLIFE SERVICES
Washington, D.C. 20240

1849•1999

FL-1

June 6, 2013

Catherine Hammond Rondeau
(b)(6) [redacted]
Leonard, MI 48367

Dear Ms. Hammond Rondeau:

On 04/12/2013, you were notified, and requested to provide additional information in regard to your application PRT- 88593A. In that request, you were informed that you needed to respond within 45 days or your application would be abandoned. Since we have not received the requested information, we have abandoned your application, and your application has been administratively closed.

If, in the future, you wish to pursue the activity for which you originally applied, you will need to submit a new application, along with any appropriate fees, to this office. Please be aware that in most cases, we will not "transfer" information from your old application to a new application. All relevant information would need to be supplied at the time a new application is submitted.

If we can be of assistance, you may contact our office at 703-358-2104 or fax 703-358-2281.

Sincerely,

Division of Management Authority
Branch of Permits`

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

AUG 14 2012

MEMORANDUM

To: Chief, Division of Management Authority

From: Chief, Division of Scientific Authority Rosemarie Gnam

Subject: General Advice on Importation of Sport-hunted Trophies of African Elephants from Tanzania for the Calendar Year 2012

This responds to your request for a finding as required under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) on various applications for the importation of sport-hunted trophies of African elephants (*Loxodonta africana*) from the United Republic of Tanzania (Tanzania) for calendar year 2012.

Please be advised that, with the information currently available, we are able to find that the importation of sport-hunted trophies of African elephants from Tanzania will be for purposes that are not detrimental to the survival of the species. This General Advice applies only to sport-hunted trophies of African elephants that were lawfully taken in Tanzania during calendar year 2012 (i.e., January 1, 2012, through December 31, 2012), provided that they are to be imported by the persons who hunted them for personal use or personal display.

If new information becomes available during 2012 that suggests that this General Advice is no longer valid, it will be suspended and reconsidered by the Division of Scientific Authority. If, after reconsideration, the Division of Scientific Authority believes that the General Advice is no longer valid, we will issue a new General Advice or require that subsequent permit applications be considered on a case-by-case basis.

BASIS FOR ADVICE:

A significant amount of information relevant to this General Advice was made available at the Fifteenth Meeting of the CITES Conference of the Parties (CoP15), including Tanzania's proposal to transfer its population of African elephants from Appendix I to Appendix II (CoP15 Prop. 4 (Rev. 1)), in addition to the Report of the Panel of Experts on Tanzania's proposal (CoP15 Doc. 68, Annex 6a). Much of the information used in making the current finding was derived from these sources, as noted below.

In addition, since CoP15, a significant amount of new information relevant to this issue has become available, including:

TAKE PRIDE IN AMERICA

ADDRESS ONLY THE DIRECTOR
FISH AND WILDLIFE SERVICE

United States Department of the Interior

FISH AND WILDLIFE SERVICE
WASHINGTON, D.C. 20240

JUN 10 1982

Memorandum

To: Chief, Federal Wildlife Permit Office

From: Chief, Office of the Scientific Authority

Subject: Importation of Leopard Trophies

The Scientific Authority advises the Management Authority that the importation of sport-hunted leopard (Panthera pardus) trophies taken in the following countries will be for purposes that are not detrimental to the survival of the species involved: Botswana, South Africa (Transvaal only), Tanzania, Zambia, and Zimbabwe. This advice applies to all leopard trophies lawfully taken in these countries on or after July 1, 1975, provided they are to be imported by the persons who hunted them for personal use or display.

Basis for Advice:

1. The factors that were considered in developing advice on leopard trophy imports are set forth in an attachment to our memorandum of March 25, 1982 (copy attached). Advice was developed in accordance with a resolution of the Parties on this subject (Conf. 2.11).

2. Each of the five countries mentioned above: (a) has laws under which the regulated sport-hunting of leopards is allowed, (b) limits the quantity, or spatial or seasonal distribution of the take of leopards, (c) bases these limits on the goal of managing leopards to sustain their populations, (d) maintains a licensing system for persons who take or process leopards (except in South Africa), and (e) implements a permitting system to regulate trade in accordance with CITES.

3. Our advice is based on a comprehensive review of the best available information on the status and management of the leopard in each of the 18 countries where it is classified as a Threatened species under the U.S. Endangered Species Act of 1973. We have information that sport-hunting of leopards is not permitted in 9 of these countries: Angola, Burundi, Gabon, Kenya, Lesotho, Malawi, Rwanda, Swaziland, and Uganda. We do not now have enough information to advise on Namibia. The available information indicates that it would not be appropriate to allow leopard trophy imports from Congo, Mozambique, or Zaire.

4. In the case of those countries not presently allowing the sport-hunting of leopards, we do not find it appropriate to advise in favor of importing specimens that were taken prior to a hunting ban. Circumstances that led to such bans were operating against the conservation of leopards in those countries. A detailed account of such circumstances in Kenya is provided by Patrick Hamilton's 1981 report to the Service on the status of the leopard and cheetah in that country.

5. We will continue to review information on the leopard, and may amend this advice as necessary. Please send us a copy of each permit issued under this advice, so that we can monitor the number of trophies imported from each country.

Richard L. Jachowski
for the Scientific Authority

Concur: Richard M. Smith 6/17/82
Associate Director-Research Date

Attachment

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

In Reply Refer To:
FWS/AIA/OMA

Memorandum

MAY 6 1997

To: The File

From: Chief, Branch of Permits

Subject: Enhancement Finding for African Elephants Taken as Sport-hunted Trophies in Tanzania

The African elephant (Loxodonta africana) is listed as threatened under the U.S. Endangered Species Act with a special rule at 50 CFR 17.40(e). The special rule sets forth requirements for the import of sport-hunted trophies, including marking requirements for ivory. Under paragraph 17.40(e)(3)(iii)(C), the Service must make a finding that the killing of the elephant whose trophy is intended for import would enhance the survival of the species.

Based on available information, the OMA believes that Tanzania is effectively conserving and managing the elephant population throughout the country and finds that the import of sport-hunted elephant trophies from Tanzania enhances the survival of the species. This finding applies to all African elephant trophies lawfully taken in Tanzania, provided they are imported by the person who hunted them for personal use.

Basis for Enhancement Finding:

Population Status: Aerial surveys of elephant populations have been undertaken by the Tanzania Wildlife Conservation Monitoring (TWCM) unit at two- to three-year intervals to monitor population trends, distribution, and recovery. Ground survey techniques have also been incorporated. They involve scientists and field staff undertaking routine monitoring duties during law enforcement patrols to determine population trends, distribution, and age and sex ratios of key populations.

Tanzania has the largest elephant population of any range state. In the early 1970's, the population was estimated at 365,000 elephants. By 1991, a population survey conducted by TWCM showed the population had dropped to approximately 57,334 elephants. This drop was primarily a result of extensive poaching which occurred during the 1970's and 1980's. A secondary factor was a reduction in habitat due to expanding human populations. The current estimates available indicate the population in Tanzania ranges from a low of 87,842 to a high of about 100,000 elephants.

- Tanzania National Elephant Management Plan 2010-2015 (TAWIRI 2012);
- The Wildlife Conservation Act, 2009 (Government of the United Republic of Tanzania 2009a);
- The Wildlife Conservation Act, 2009 (Act Supplement No. 5; 20th March, 2009; Government of the United Republic of Tanzania 2009b);
- The Wildlife Conservation (Tourist Hunting) Regulations, 2010 (Subsidiary Legislation Supplement No. 25; 2nd July, 2010; Government of the United Republic of Tanzania 2010);
- Third African Elephant Meeting (1-3 November 2010; Gigiri, Kenya; various documents); and
- Documents from the 62nd Meeting of the CITES Standing Committee (Geneva 2012).

Much of the information used in making the current finding was derived from these sources, as noted below, as well as previously cited information (see AOSA106; dated July 23, 2010; [Division of Scientific Authority 2010]).

Conservation and Management

1. African elephants are widely distributed throughout Tanzania, covering 49% of the country's land area. About 37% of the elephant's range in that country is in protected areas (PA). This proportion of protected range is relatively high compared to other African elephant range countries (Blanc *et al.* 2007). These protected areas comprise 26% of the country's land area within six ecosystems throughout the country, including: Tarangire-Manyara, Serengeti, Selous-Mikumi, Ruaha-Rungwa, Katavi-Rukwa, and Moyowosi-Kigosi. The network of PAs includes 15 National Parks (NP) (4% of the country's land surface), Ngorongoro Conservation Area (1%), 28 Game Reserves (GR) (14%), and 33 Game Controlled Areas (GCA) and/or Wildlife Management Areas (WMA) (5%). Some of these areas were designated as recently as 2005 (CoP15 Doc. 68, Annex 6a [page 1]).

2. In Tanzania, the only consumptive use of African elephants is sport hunting [CoP15 Prop. 4 (Rev. 1)], which is covered by The Wildlife Conservation (Tourist Hunting) Regulations, 2010 (Government of the United Republic of Tanzania 2010). These regulations control hunting by concession area, season, minimum trophy sizes (18 kg and 160 cm per tusk), annual quotas, post-hunt reporting, trophy registration, marking, and export requirements [CoP15 Doc. 68 Annex 6a [page 11]; Part V, Regulation 24.-(5)(b)].

3. The trophy quota for African elephants is distributed among approximately 150 hunting concessions/blocks [Ministry of Natural Resources and Tourism (United Republic of Tanzania), in litt., 2008] with the number of trophy permits allotted to each concession determined by elephant survey information (Ministry of Natural Resources and Tourism, in litt., 2005).

4. According to the Ministry of Natural Resources and Tourism (in litt., 2008), 25% of the revenue accrued from the sport hunting of elephants goes to the conservation and protection of

African elephants and other wildlife species through the Tanzania Wildlife Protection Fund (TWPF). In addition, 25% of the game fees received from hunters is given to the local communities in the areas where the sport hunting took place. Apart from being the source of revenue to local communities, sport hunting plays an important role in creating employment for the members of the local communities, for example, as trackers, skinners, tent and mess attendants, and guards (Ministry of Natural Resources and Tourism, in litt., 2008). The Ministry of Natural Resources and Tourism (in litt., 2008) also reported that the sport hunting program assisted in curbing illegal harvesting and developing infrastructure such as roads, hospitals, and schools, as well as creating a market for local artwork.

5. The 1998 Wildlife Policy of the United Republic of Tanzania was revised in 2007 and provides guidelines for the management of African elephants through the development, review, and updating of specific management plans (CoP15 Doc. 68, Annex 6a [page 4]).

6. This past year, Tanzania published its country-level strategy and action plan, the "Tanzania National Elephant Management Plan 2010-2015." This plan provides updated information on several biological and ecological topics, including: distribution and range, abundance, population trends and demography, elephant corridors, and human-elephant conflicts. It identifies nine different strategic objectives, as well as numerous specific objectives and their associated targets, actions, timelines, actors, and indicators. The strategic objectives include: Human-Elephant Conflict, Elephant Corridors, Law Enforcement, Benefits and Sustainable Utilization, Ivory Stockpile and Management System, Research and Monitoring, Elephant Health and Welfare, Cross-border Cooperation, and Elephant Information Management (TAWIRI 2012).

Population Status and Trends

7. In 2006, the Tanzania Wildlife Research Institute [TAWIRI 2007 (cited in CoP15 Doc. 68, Annex 6a [page 1])] estimated the African elephant populations of Tanzania at 139,915 ± 12,338 (SE) animals based on census surveys covering 227,328 km^2 conducted using both total and sample counts. According to the Panel of Experts, this estimate was not significantly different from that of 111,475 ± 18,728 (95% CL) elephants estimated in 2000-2003. The Panel of Experts noted that the 2006 estimate did not include 2,873 additional elephants from areas not formally surveyed, which provided a country-wide "best estimate" of 142,788 ± 12,405 (SE) elephants in 2006 (CoP15 Doc. 68, Annex 6a [page 1]). In 2006, according to the African Elephant Status Report (Blanc *et al.*, 2007), the "definite" category estimate was 108,816 elephants, in addition to 27,937 "probable," 29,350 "possible," and 900 "speculative" category estimates.

8. In 2009, a similar survey covering 229,318 km^2 across the same six ecosystems produced a total population estimate of 105,439 ± 6,080 (SE) African elephants [TAWIRI 2010a (cited in CoP15 Doc. 68, Annex 6a)]. A "best estimate," which included an additional 3,583 elephants, provided a country-wide estimate of 109,022 ± 6,135 (SE) elephants in 2009. The Panel of

Experts noted that these results suggested a significant decline compared to the 2006 estimate of 142,788 elephants and that the decline could be attributed largely to a downward population trend recorded in the Selous-Mikumi ecosystem (CoP15 Doc. 68, Annex 6a [page 1]); however, Tanzania later clarified that methodological issues during the 2006 survey is believed to have resulted in an overestimate, and therefore, the two years' results cannot be compared due to different study techniques. Although a survey was also conducted in 2011, the final survey report is not yet available (SC62 Inf. 1).

9. Demographic parameters were calculated between 2009 – 2010 from 2,182 African elephants from six major elephant populations in Tarangire, Serengeti, Ruaha-Rungwa, Selous, Katavi-Rukwa, and Ugalla (TAWIRI 2012). This demographic survey of African elephants revealed that the proportion of the population < 5 years of age varied from 41% in Tarangire to 25% in Ugalla River Game Reserve, with values above 30% (Tarangire, Selous, Serengeti, and Ruaha-Rungwa). These results were indicative of good to high growth rates. The Panel of Experts, citing Foley and Faust (2010), further pointed out that Tarangire had a growth rate of > 6% and was one of the highest growth rates ever recorded for an African elephant population. It was noted that those populations with the proportion of their herds < 5 years of age below 30% (Katavi and Ugalla Game Reserve), which is indicative of low recruitment and growth rates, suggested one or more population stressors, such as higher infant mortality or increased stress associated with human-elephant conflict or illegal activity (i.e., poaching) (CoP15 Doc. 68, Annex 6a [pages 1-2]).

10. The Panel of Experts concluded that while estimates at that time suggested that the Tanzanian African elephant populations were stable or possibly decreasing, elephant populations still remained large (> 100,000 individuals) and were demographically healthy. The Panel of Experts noted that the populations of African elephants were geographically widespread across the country and occupied diverse ecosystems, and that a high proportion of the populations (> 80% individuals) occupied protected areas. In the overall opinion of the Panel of Experts, the African elephant populations in Tanzania were viable at the time of the analysis (CoP15 Doc. 68, Annex 6a [page 2]).

11. The Panel of Experts, however, raised concerns about the future mobility of the African elephant populations in Tanzania. They noted, for example, that associated human settlements were increasing in size and number around protected areas and were accompanied by increasing human-elephant conflicts. These settlements and the associated conflicts were probably the most important factors limiting the elephants' mobility and range. It was the opinion of the Panel of Experts that -- at the rates of habitat change and land conversion at the time -- the corridors that still remained in Tanzania would be converted to unsuitable habitat in less than 5 years (CoP15 Doc. 68, Annex 6a [page 4]).

12. According to Jones et al. (2009), Tanzania was working to minimize risks to African elephants, other wildlife, people, and property through improvements in spatial planning involving the identification, maintenance, and restoration of wildlife corridors. The "Tanzania

National Elephant Management Plan 2010-2015" lays out a strategic objective to restore lost corridors and to increase protection for corridors that are identified to still be in use (TAWIRI 2012).

Sustainability of Off-Take

13. In Tanzania, African elephant deaths occur as a result of several factors, including: 1) natural mortality; 2) trophy hunting; 3) problem animal control; and 4) poaching. In order to evaluate whether off-take from trophy hunting was sustainable, all losses to the African elephant population must be considered.

Legal Off-Take

14. Since 2007, the annual CITES Export Quota for the United Republic of Tanzania has been 400 tusks (sport-hunting quota of 200 elephants). During 2003-2006, the quota was 200 tusks from 100 individuals, while during 1997-2002 the quota was 100 tusks from 50 individuals. Tanzania, however, typically has not exported its full quota allotment in sport-hunted trophies or African elephant tusks. During 1997-2009, for example, annual tusk exports typically were about 40-45% of the allowed quantities and never exceeded the approved annual quota (UNEP-WCMC CITES Trade Database; available on the internet at: http://www.unep-wcmc.org/citestrade; accessed on 8 March 2010).

15. The Panel of Experts also assessed the sustainability of legal off-take from African elephant populations in Tanzania. Complete records on natural mortality for the entire country or on the killing of problem elephants were not available, but the Panel of Experts was able to estimate the level of such off-take by analyzing the data from the ivory store databases of Tanzania. Based on 21 years of data for that country, an average of 231 elephants died annually from natural mortality, while another 287 individuals died annually from elephant control measures (CoP15 Doc. 68, Annex 6a [page 5]).

16. Based a sport-hunting quota of 200 African elephants, as well as the estimates cited earlier for natural mortality and problem animal control in Tanzania, the Panel of Experts estimated that the overall legal off-take of African elephants from the several populations in that country was about 718 annually, which was 0.7% of the 2009 elephant population estimate of 109,022 individuals. Even if natural mortalities were considerably higher due, for example, to low carcass detection rates by observers in difficult terrain, the Panel of Experts believed that the legal off-take was still less than the annual population growth rate of 3-5% and, therefore, was sustainable (CoP15 Doc. 68, Annex 6a [page 14]).

17. The Panel of Experts also assessed whether the hunting of trophy-quality males in Tanzania was sustainable. According to an earlier analysis by Martin (1986), an annual harvest rate of 0.5-1.0% of the total African elephant population was sustainable. Based on the available population information, the Panel of Experts estimated that nationwide there was a potential off-take of 325 trophy-quality African elephant males (0.3% of the total population; CoP15 Doc. 68,

Annex 6a [page 14]). The Panel of Experts noted that this value of 0.3% was less than the value of 0.5-1% of total African elephant numbers and concluded that the hunting was sustainable.

Illegal Off-Take

18. According to the Panel of Experts, official poaching statistics provided by the Wildlife Division of Tanzania indicated 258 reported poaching incidents that were detected during 2005-2009, including 82 poaching incidents in 2009, the highest number poached annually during that time period. The Panel of Exports noted, however, that the total number of poaching incidents was likely underestimated given low African elephant carcass detection rates (CoP15 Doc. 68, Annex 6a [page 5]).

19. The Panel of Experts cited the following evidence that poaching has led to elephant population declines in the Selous-Mikumi ecosystem:

> *a) PIKE values collected at the Selous-Mikumi MIKE site have progressively increased between 2003 and 2009 (CITES Secretariat, 2010).*
>
> *b) Joint Wildlife Division/Selous Rhino Project aerial observations and foot patrols recorded more than a threefold increase in encounter rates of recently dead elephant carcasses between 2007 and 2008 (TAWIRI, 2010b).*
>
> *c) Tourism operators operating in the northern Selous reported to the Panel an increase in elephant (and other wildlife) poaching since 2007/8, including several incidents close to tourist camps.*
>
> *d) A significant proportion of the large seizures of ivory made in Asia in 2006 have been traced by forensic DNA work to elephants killed in the Selous-Niassa area (Wasser et al., 2009).*
>
> Note: PIKE = Proportion of illegally killed elephants

20. The Panel of Experts also pointed to evidence that the Selous-Mikumi ecosystem was a "hotspot" for African elephant poaching. They observed that the ivory that had been collected by wildlife enforcement officials at Udzungwa National Park was from confiscations. According to these officials, the confiscations consisted of illegally-sourced ivory coming out of nearby Kilombero Game Controlled Area in the Selous-Mikumi ecosystem. In addition, the highest number of tusks confiscated by field-based Wildlife Division offices originated from Morogoro and Lindi, which are adjacent to the Selous-Mikumi ecosystem (CoP15 Doc. 68, Annex 6a [page 5]).

21. Given the factors discussed above, the Panel of Experts concluded that the level of off-take at that time was not sustainable in the Selous-Mikumi ecosystem, which represents about 40% of the total African elephant population in Tanzania. They also noted, however, that legal and

illegal off-take appeared to be sustainable in the five other elephant ecosystems where the populations were stable or increasing. Expressing concern about the potential for off-take levels in the Selous-Mikumi ecosystem to have a future negative impact on the African elephant population as a whole, the Panel of Experts stated:

> *"Whilst not unequivocally substantiated, the Selous-Mikumi situation described above could affect long-term population sustainability."* .
> (CoP15 Doc. 68, Annex 6a [page 3])"

22. Based on a more recent analysis of MIKE data, the levels of illegal killing across the African elephants' range are of serious and increasing concern. Between 2009 and 2011, PIKE values remained high at the Selous-Mikumi MIKE site (SC62 Inf. 1). Moreover, a March 2012 IUCN African Elephant Specialist Group survey indicated that poaching over the last 12 months had increased in sites in Tanzania (SC62 Doc. 46.1 (Rev. 1).

23. Another concern that the Panel of Experts raised, which relates to the commitment by the Tanzania to combat poaching, was the financial mechanism by which the Wildlife Division was funded. The Wildlife Division's revenue share is paid directly to the central Treasury, and the Treasury is then supposed to distribute the budgeted monies to the Wildlife Division. The Panel of Experts raised the concern that over a 3-year period (2007-2009), the Wildlife Division had received only 63% (USD 2,634,975 per year) of its approved budget from the central Treasury. The Panel noted that given these funding limitations, the Wildlife Division would not be able to meet its needs and obligations regarding the conservation, management, and protection of African elephants. The Panel of Experts also noted, however, that between 2005 and 2009, the Tanzania Wildlife Protection Fund contributed on average a total of USD 12,894,564 annually to the Wildlife Division. According to the Panel of Experts, these funds, when combined with the Treasury allocations, should have put the Wildlife Division in a "strong position" to meet its enforcement obligations, including containment of threats to elephants in the Selous-Mikumi ecosystem (CoP15 Doc. 68, Annex 6a [page 3]). Recent African elephant poaching levels in the Selous-Mikumi ecosystem, however, suggest that enforcement may have been inadequate.

24. The Panel of Experts also noted that the National Parks and the Ngorongoro Conservation Area Authorities of Tanzania were adequately funded because they generated and retained 100% of their revenue share through park and conservation area fees (CoP15 Doc. 68, Annex 6a [page 3]).

25. Although the Panel of Experts raised concerns over the illegal killing of elephants in the Selous-Mikumi ecosystem, they also acknowledged the efforts by authorities of Tanzania to combat the increases in poaching. For example, in July 2009, a series of planning meetings led to anti-poaching patrols that were joint and cooperative, and involved rangers and scouts from the Selous Game Reserve, the Udzungwa Mountains National Park, and the Mikumi National Park. In December 2009, for example, the commander of special police operations led an anti-poaching operation, code-named "Operation Butterfly," in the Selous Game Reserve. This operation led to the arrest of 70 poachers and the recovery of elephant and hippopotamus ivory

(Midala 2010, *as cited in* TAWIRI 2012). Noting these, as well as other anti-poaching efforts by the Tanzanian authorities, the Panel of Experts stated:

> *"There is a clear indication of concern by the authorities to minimize poaching of elephant and other wildlife species. The various efforts to deploy staff and execute special anti-poaching operations in various parts of the country, particularly in the vast Selous Game Reserve, are noteworthy."*
> (CoP15 Doc. 68, Annex 6a [page 14]).

26. The Director of Wildlife of Tanzania informed the Panel of Experts that regulations were being finalized to implement The Wildlife Conservation Act, 2009, which would reportedly increase revenue retention, increase penalties up to 30 years, and provide additional powers to law enforcement personnel (CoP15 Doc. 68, Annex 6a [page 11]). Copies of those laws and regulations were provided to the U.S. Fish and Wildlife Service (Service) at a February 17, 2011, meeting with Tanzanian officials.

27. The "Tanzania National Elephant Management Plan 2010-2015" is based on several new wildlife laws and implementing regulations (TAWIRI 2012): The Wildlife Conservation Act, 2009 (Government of the United Republic of Tanzania 2009a); The Wildlife Conservation Act, 2009 (Act Supplement No. 5; 20th March, 2009; Government of the United Republic of Tanzania 2009b); and The Wildlife Conservation (Tourist Hunting) Regulations, 2010 (Subsidiary Legislation Supplement No. 25; 2nd July, 2010; Government of the United Republic of Tanzania 2010). During the February 2011, meeting, the Service received copies of these measures, but it was not clear when they would be fully implemented. For example, the Subsidiary Legislation (Supplement No. 25; 2nd July, 2010) of The Wildlife Conservation (Tourist Hunting) Regulations, 2010, in Part V, 24.-(5)(b), directs that no person shall hunt an elephant with tusks weighing below 18 kg per tusk or measuring not less that 160 cm per tusk (Government of the United Republic of Tanzania 2010). In another example, the Act Supplement (No. 5; 20th March, 2009) of The Wildlife Conservation Act, 2009, in Part IV, calls for the protection of wildlife corridors, dispersal areas, buffer zones, and migratory routes (Government of the United Republic of Tanzania 2009b). Both of these measures are critically important to the conservation of the African elephant, but it is not clear when they will become operational and backed by the force of law in Tanzania. Until the new laws are fully implemented, these African elephant conservation and management measures, while improving, are still in a transitional phase.

Conclusion

28. With the information currently available, we believe that the status of the African elephant population in Tanzania and ongoing management efforts in that country are adequate to ensure that the sport hunting of African elephants, as administered by the Government of the United Republic of Tanzania, does not adversely affect the status of the species in Tanzania.

29. Therefore, for calendar year 2012, we find that the import of sport-hunted trophies of African elephants taken in Tanzania will be for purposes that are not detrimental to the survival of the species.

CONCERNS:

Although we are able to make the current non-detriment finding, we still have concerns about the future sustainability of the total levels of off-take from the African elephant populations in Tanzania. These concerns – in part -- were also noted by the Panel of Experts (CoP15 Doc. 68, Annex 6a [pages 13-16]):

A. Efforts have been made by Tanzania to combat poaching in the Selous-Mikumi ecosystem. We also acknowledge that additional resources are now available to promote the conservation status of the African elephant in that country, including: "Tanzania National Elephant Management Plan 2010-2015" (TAWIRI 2012); The Wildlife Conservation Act, 2009 (Government of the United Republic of Tanzania 2009a); The Wildlife Conservation Act, 2009 (Act Supplement No. 5; 20th March, 2009; Government of the United Republic of Tanzania 2009b); and The Wildlife Conservation (Tourist Hunting) Regulations, 2010 (Subsidiary Legislation Supplement No. 25; 2nd July, 2010; Government of the United Republic of Tanzania 2010). The Service is interested in receiving an update on whether the management and regulatory measures mentioned above have been fully implemented, and if not, the targeted time period for full implementation of these measures. In particular, we remain concerned about the availability of future resources to combat poaching in Tanzania, especially in the Selous-Mikumi ecosystem. In this regard, we are interested in receiving updated information on recent initiatives and their effectiveness in combating poaching in Tanzania, particularly in the Selous-Mikumi ecosystem.

B. It is our understanding that the elephant population in the Selous ecosystem in Tanzania was surveyed in 2011 but that the results have not yet been available. We are interested in receiving these results as soon as they are available.

C. We note that most of the 23 known elephant corridors in Tanzania are in poor condition (TAWIRI 2012). We recognize that the "Tanzania National Elephant Management Plan 2010-2015" includes a strategic framework for increasing protection for these corridors and for restoring lost corridors and that laws and regulations are available to protect these corridors. Given the importance of protecting these corridors from ongoing threats and the risks to the African elephant populations in the future as a result of human-elephant conflict in and around these areas, we are interested in receiving updated information on Tanzania's success to date in achieving its objectives related to the protection of African elephant corridors, as laid out in the "Tanzania National Elephant Management Plan 2010-2015" (TAWIRI 2012).

D. Based on recent information obtained through the National Website of Tanzania, we understand that new procedures have been implemented regarding the allocation of tourist hunting blocks [see: Invitation For Applications For Tourist Hunting Blocks Allocation For The Period 2013 – 2018; (Made under Section 9 (2) of the Wildlife Conservation Act, Cap.283 (Tourist Hunting Regulations of 2010); http://www.tanzania.go.tz/ministriesf.html; accessed on March 9, 2011); Government of the United Republic of Tanzania 2011]. These changes deal primarily with the hunting block fees that will be charged by the government. We are interested in receiving information about these changes and how they could affect African elephant harvest quotas or off-take levels associated with the corresponding hunting blocks. Given the recent uncertainty about the total population sizes and trends of African elephant populations in the United Republic of Tanzania, especially in the Selous-Mikumi ecosystem, we will continue to monitor African elephant population survey results, as well as overall harvest quotas and off-take levels for this species in the United Republic of Tanzania.

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Sport hunted trophy permit re-issuance application.....88593A

Braxton, Ailteas <ailteas_braxton@fws.gov> Fri, Apr 12, 2013 at 12:40 PM
To: (b)(6) [redacted]

Ms. Rondeau,

I am currently processing your application. Please forward the original copy of the permit to my attention as soon as possible.

I can not continue to process without this.

Thank you
Ailteas Braxton
Legal Examiner
U.S. Fish and Wildlife Services
Division of Management Authority
ailteas_braxton@fws.gov
703 358-1978 direct dial
703 358-2281 fax

If the information requested above is not received within 45 days, your application will be considered incomplete and will be administratively closed.

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: U.S. Fish and Wildlife Service
(Enter address from pages 4 and 5 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1 a. Last name	1 b. First name	1 c. Middle name or initial	1 d. Suffix
Rondeau	Catherine	Hammond	

2. Date of birth (mm/dd/aaaa)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(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

7 a. Business telephone number	7 b. Alternate telephone number	7 c. Business fax number	7 d. Business e-mail address

C. All applicants complete address information

1 a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6)

1 b. City	1 c. State	1 d. Zip code/Postal code	1 e. County/Province	1 f. Country
Leonard	MI	48367	Oakland	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 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? attached
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue 12US88593A/9 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures)

3-22-2013
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: *Applications **must** be submitted to the office that issued the initial permit. This form cannot be used for lost or damaged permit. Lost or damaged permit must use form 3-200-66.*

NOTE 2: *If you are renewing your Designated Port Exemption permit, use form 3-200-2 (http://www.fws.gov/forms/3-200-2.pdf). 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 3: *If you are renewing or amending a master file for multiple shipments or a COSE, use the appropriate form for proposed activity (form 3-200-29 for samples; 3-200-30 for circus/traveling exhibits; 3-200-33 for Artificially Propagated Plants; 3-200-39 for COSEs) (http://www.fws.gov/forms/ display.cfm?number1=200).*

1. **Permit number.** Enter the permit number to be reissued/renewed 12US88593A/9. The original permit **must** be submitted with this application.

2. **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.

3. **Annual Report.** If required by your permit, provide an annual report as conditioned. (Disregard if you have already submitted your annual report.)

4. **Captive-Bred Wildlife Registration (CBW):** If the location of activities has changed, attach a description and photographs or diagrams (no blueprints) of the current facilities. If a change in personnel (e.g., principal officer, curator, and primary animal care staff) has occurred, provide a brief description of their expertise in caring/handling of the species.

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:

   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:

   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.
   [On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, port location.) Please sign each attached page. Also, please note that we may ask you to submit additional information.]

   Permittee's signature: (b) (6) [redacted] Date: 3-23-2013

7. Address where you wish permit mailed (if different than page 1): Same address

8. If you wish the permit to be sent to you by means other than regular mail, provide an air bill, pre-paid envelope, or billing information: n/a

9. Who should we contact if we have questions about the application? (Include name, phone number, and email):

   Catherine Hammond Rondeau
   (b)(6) [redacted]

Catherine Rondeau
(b)(6)
[redacted]

March 23, 2013

RE: CITES permit # 12US88593A/9

Dear Sir or Madam,

Could you please reissue the attached CITES permit? I shot an elephant during the 2012 hunting season, and I am currently making arrangements to have it shipped from the hunting grounds to the United States.

I would like to change the consignee in box 4 to read:

Gerard Pasanisi Safari
PO Box 21880
Dar Es Salaam
Tanzania

I have enclosed the $50 fee.

If you have any questions, please, please call or email me.

Thank you very much,
(b) (6)
[redacted]
Catherine Rondeau

FORM 3-200A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
12US88593A/9

2. Valid until
10/31/2013

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b)(6)
LEONARD, MI 48367
U.S.A.

4. Consignee (name and address, country)
TANGYANIKA WILDLIFE SAFARI
UHURU STREET, PLOT 38
NEAR BUGURUNI POLICE POST, P.O. BOX 21880
BUGURUNI KISIWANI
DAR ES SALAAM
TANZANIA

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.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-3247

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.

11/01/2012
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 ELEPHANT Scientific Name LOXODONTA AFRICANA	9. 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. I W 11. Quantity (including units) 1 NO 12. Country of Origin TANZANIA
B. 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. I W 11. Quantity (including units) 1 NO 12. Country of Origin TANZANIA
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

371235

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
12US88593A/9

2. Valid until
10/31/2013

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b) (6) [redacted]
LEONARD, MI 48367
U.S.A.

4. Consignee (name and address, country)
TANGYANIKA WILDLIFE SAFARI
UHURU STREET, PLOT 38
NEAR BUGURUNI POLICE POST, P.O. BOX 21880
BUGURUNI KISIWANI
DAR ES SALAAM
TANZANIA

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.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-3247

-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

U.S. CITES Management Authority

11/01/2012
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 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 NO 12. Country of Origin TANZANIA
B. 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 TANZANIA
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

371235

12US88593A/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.

11/01/2012
Date

U.S. CITES Management Authority

Chief, Branch of Permits
Division of Management Authority

371236

8/16/13
L/m

Nichols, Shaunta <shaunta_nichols@fws.gov>

CITES permit

cathy rondeau <(b) (6) Tue, Aug 13, 2013 at 4:54 PM
To: "shaunta_nichols@fws.gov" <shaunta_nichols@fws.gov>, (b)(6)
<(b)(6)

Hi Shaunta,

How are you? I am hoping you can help me out.

I received a CITES permit (No. 88593A) many months ago. In March, I sent an application to have it changed because a name was wrong on it. On April 1, I received a letter stating that you had received my application. On April 12, I received a request to turn in the original permit. This was surprising as nowhere on the website or in the instructions did it say I needed to turn in the original permit. I sent it in on April 13.

I called 800-358-2104 today to find out about the revised permit and was told that it has been abandoned. I checked with the nice man to see if my email, work address, and phone numbers are correct in your system, and they are. So, I was surprised to hear that my permit was abandoned with no further communication.

I left a message on Ailteas's voice mail, and I have not heard back from her.

Could you please help me get my revised permit? I really don't have the money to pay again, when I have already paid twice.

Thank you very much,

Cathy Hammond Rondeau

(b)(6)

RCVD JUL 17 2014

7-4-14

Dear Sir or Madame,

I am seeking to replace the attached CITES permit for the elephant I shot in 2012 because it is expired.

I had to replace this permit once already because the consignee's name did not match exactly on the CITES & the Tanzania export permit. By the time I got the attached replacement, all the other paperwork had expired.

Neither the first permit nor this one were used in any way. The elephant tusks etc are still in storage in Tanzania.

Thank you,

(b) (6) [redacted]

RCVD JUL 17 2014 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 4 and 5 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Rondeau	Catherine	Hammond	Mrs.

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6) [redacted]			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Leonard	MI	48367	Oakland	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Oakland	MI	48363	Oakland	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 12US88593A/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted] 7-4-2014

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) 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 13US88593A/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: (b) (6) [redacted] Date: 7-14-14

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.

Please note new mailing address

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):

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.

☐ 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):

Catherine Hammond Rondeau
(b)(6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

(b) (6) [redacted]

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
13US88593A/9

2. Valid
10/31/2013

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b)(6)
LEONARD, MI 48367
U.S.A.

4. Consignee (name and address, country)
GERARD PASANISI SAFARI
P.O. BOX 21880
DAR ES SALAAM
TANZANIA

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 AMENDS AND REPLACES 12US88593A/9 ISSUED 11/01/2012.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-3247

-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.

09/12/2013
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 ELEPHANT Scientific Name LOXODONTA AFRICANA	9. 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 NO 12. Country of Origin TANZANIA
B. 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 TANZANIA
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

513437

13US88593A/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.

U.S. CITES
Management Authority

09/12/2013
Date

Chief, Branch of Permits
Division of Management Authority

513416

RCVD JUL 17 2014

7-4-14

Dear Sir or Madame,

I am seeking to replace the attached CITES permit for the elephant I shot in 2012 because it is expired.

I had to replace this permit once already because the consignee's name did not match exactly on the CITES & the Tanzania export permit. By the time I got the attached replacement, all the other paperwork had expired.

Neither the first permit nor this one were used in any way. The elephant tusks etc are still in storage in Tanzania.

Thank you,

(b) (6) [redacted]

RCVD JUL 17 2014 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 4 and 5 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Rondeau	Catherine	Hammond	Mrs.

(b)(6) [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)(6) [redacted]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b)(6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Leonard	MI	48367	Oakland	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Oakland	MI	48363	Oakland	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 12US88593A/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement in this application may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 7-4-2014

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 13US88593A/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: (b) (6) Date: 7-14-14

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.

Please note new mailing address

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):

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.

☐ 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):

Catherine Hammond 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.

(b) (6) [redacted]

Form 3-200 (rev)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
12US88583A/9

2. Valid
10/31/2013

3. Permittee (name and address, country)
CATHERINE RAIMONDI RONDEAU
(b)(6)
LEONARD, MI 48367
U.S.A.

4. Consignee (name and address, country)
GERARD PARANGI SAFARIS
P.O. BOX 21550
DAR ES SALAAM
TANZANIA

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 AMENDS AND REPLACES 12US88583A/8 ISSUED 11/01/2012.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-1247

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.

09/12/2013
Issuing Date

CITES Management Authority
United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

7(a). Common Name and Scientific name (genus and species) of Animal or Plant	8. Description of Part or Derivative, including identifying marks or numbers (species if live)	10. Appendix (A) and Source
A. Common Name AFRICAN ELEPHANT Scientific Name LOXODONTA AFRICANA	9. IMPORT IMPORT PERSONAL SPORT HUNTED TROPHY (shipment may contain bones, hair, hide, head, teeth, or any taxidermied part. DOES NOT include worked, manufactured, or handicraft items such as coins, jewelry, or other utilitarian items.)	10. A W 11. Quantity (including units) 1 NO 12. Country of Origin TANZANIA
B. 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 coins, jewelry, or other utilitarian items.)	10. A W 11. Quantity (including units) 1 NO 12. Country of Origin TANZANIA
C. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
D. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
E. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]

13US88593A/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.

09/12/2013
Date

U.S. CITES Management Authority

Chief, Branch of Permits
Division of Management Authority

513416

8/16/13
L/m

Nichols, Shaunta <shaunta_nichols@fws.gov>

CITES permit

cathy rondeau (b) (6) Tue, Aug 13, 2013 at 4:54 PM
To: "shaunta_nichols@fws.gov" <shaunta_nichols@fws.gov>, (b)(6)
(b)(6)

Hi Shaunta,

How are you? I am hoping you can help me out.

I received a CITES permit (No. 88593A) many months ago. In March, I sent an application to have it changed because a name was wrong on it. On April 1, I received a letter stating that you had received my application. On April 12, I received a request to turn in the original permit. This was surprising as nowhere on the website or in the instructions did it say I needed to turn in the original permit. I sent it in on April 13.

I called 800-358-2104 today to find out about the revised permit and was told that it has been abandoned. I checked with the nice man to see if my email, work address, and phone numbers are correct in your system, and they are. So, I was surprised to hear that my permit was abandoned with no further communication.

I left a message on Ailteas's voice mail, and I have not heard back from her.

Could you please help me get my revised permit? I really don't have the money to pay again, when I have already paid twice.

Thank you very much,

Cathy Hammond Rondeau

(b)(6)

Sport hunted trophy permit re-issuance application.....88593A

Braxton, Ailteas <ailteas_braxton@fws.gov> Fri, Apr 12, 2013 at 12:40 PM
To: (b)(6)

Ms. Rondeau,

I am currently processing your application. Please forward the original copy of the permit to my attention as soon as possible.

I can not continue to process without this.

Thank you
Ailteas Braxton
Legal Examiner
U.S. Fish and Wildlife Services
Division of Management Authority
ailteas_braxton@fws.gov
703 358-1978 direct dial
703 358-2281 fax

If the information requested above is not received within 45 days, your application will be considered incomplete and will be administratively closed.

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: U.S. Fish and Wildlife Service
(Enter address from pages 4 and 5 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: Rondeau	1.b. First name: Catherine	1.c. Middle name or initial: Hammond	1.d. Suffix:
2. (b)(6)	3. Social Security No.: (b)(6)	4. Occupation: teacher	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number: (b)(6)	6.b. Alternate telephone number: \	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		
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: Leonard	1.c. State: MI	1.d. Zip code/Postal code: 48367	1.e. County/Province: Oakland	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 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? attached
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 12458593A/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50,*** and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) — 3-22-2013

Signature (in blue ink) of applicant/person responsible for permit (NO photocopied or stamped signatures) — 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**: Applications **must** be submitted to the office that issued the initial permit. This form cannot be used for lost or damaged permit. Lost or damaged permit must use form 3-200-66.*

***NOTE 2**: If you are renewing your Designated Port Exemption permit, use form 3-200-2 (http://www.fws.gov/forms/3-200-2.pdf). 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 3**: If you are renewing or amending a master file for multiple shipments or a COSE, use the appropriate form for proposed activity (form 3-200-29 for samples; 3-200-30 for circus/traveling exhibits; 3-200-33 for Artificially Propagated Plants; 3-200-39 for COSEs) (http://www.fws.gov/forms/display.cfm?number1=200).*

1. **Permit number.** Enter the permit number to be reissued/renewed 12US88593A/9. The original permit **must** be submitted with this application.

2. **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.

3. **Annual Report.** If required by your permit, provide an annual report as conditioned. (Disregard if you have already submitted your annual report.)

4. **Captive-Bred Wildlife Registration (CBW):** If the location of activities has changed, attach a description and photographs or diagrams (no blueprints) of the current facilities. If a change in personnel (e.g., principal officer, curator, and primary animal care staff) has occurred, provide a brief description of their expertise in caring/handling of the species.

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:

   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:

   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.
   [On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, port location.) Please sign each attached page. Also, please note that we may ask you to submit additional information.]

   Permittee's signature: (b) (6) [redacted] Date: 3-23-2013

7. Address where you wish permit mailed (if different than page 1): Same address

8. If you wish the permit to be sent to you by means other than regular mail, provide an air bill, pre-paid envelope, or billing information: n/a

9. Who should we contact if we have questions about the application? (Include name, phone number, and email):

   Catherine Hammond Rondeau

   (b)(6) [redacted]

Catherine Rondeau
(b)(6)
Leonard, MI 48367
(b)(6)
(b)(6)

March 23, 2013

RE: CITES permit # 12US88593A/9

Dear Sir or Madam,

Could you please reissue the attached CITES permit? I shot an elephant during the 2012 hunting season, and I am currently making arrangements to have it shipped from the hunting grounds to the United States.

I would like to change the consignee in box 4 to read:

Gerard Pasanisi Safari
PO Box 21880
Dar Es Salaam
Tanzania

I have enclosed the $50 fee.

If you have any questions, please, please call or email me.

Thank you very much,
(b) (6)

Catherine Rondeau

FORM 3-200A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
12US88593A/9

2. Valid until
10/31/2013

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b)(6)
LEONARD, MI 48367
U.S.A.

4. Consignee (name and address, country)
TANGYANIKA WILDLIFE SAFARI
UHURU STREET, PLOT 38
NEAR BUGURUNI POLICE POST, P.O. BOX 21880
BUGURUNI KISIWANI
DAR ES SALAAM
TANZANIA

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.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-3247

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.

11/01/2012
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 ELEPHANT Scientific Name LOXODONTA AFRICANA	9. 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 NO 12. Country of Origin TANZANIA
B. 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 TANZANIA
C. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
D. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
E. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]

3712135

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

In Reply Refer To:
FWS/AIA/OMA

Memorandum

MAY 6 1997

To: The File

From: Chief, Branch of Permits

Subject: Enhancement Finding for African Elephants Taken as Sport-hunted Trophies in Tanzania

The African elephant (Loxodonta africana) is listed as threatened under the U.S. Endangered Species Act with a special rule at 50 CFR 17.40(e). The special rule sets forth requirements for the import of sport-hunted trophies, including marking requirements for ivory. Under paragraph 17.40(e)(3)(iii)(C), the Service must make a finding that the killing of the elephant whose trophy is intended for import would enhance the survival of the species.

Based on available information, the OMA believes that Tanzania is effectively conserving and managing the elephant population throughout the country and finds that the import of sport-hunted elephant trophies from Tanzania enhances the survival of the species. This finding applies to all African elephant trophies lawfully taken in Tanzania, provided they are imported by the person who hunted them for personal use.

Basis for Enhancement Finding:

Population Status: Aerial surveys of elephant populations have been undertaken by the Tanzania Wildlife Conservation Monitoring (TWCM) unit at two- to three-year intervals to monitor population trends, distribution, and recovery. Ground survey techniques have also been incorporated. They involve scientists and field staff undertaking routine monitoring duties during law enforcement patrols to determine population trends, distribution, and age and sex ratios of key populations.

Tanzania has the largest elephant population of any range state. In the early 1970's, the population was estimated at 365,000 elephants. By 1991, a population survey conducted by TWCM showed the population had dropped to approximately 57,334 elephants. This drop was primarily a result of extensive poaching which occurred during the 1970's and 1980's. A secondary factor was a reduction in habitat due to expanding human populations. The current estimates available indicate the population in Tanzania ranges from a low of 87,842 to a high of about 100,000 elephants.

ADDRESS ONLY THE DIRECTOR
FISH AND WILDLIFE SERVICE

United States Department of the Interior

FISH AND WILDLIFE SERVICE
WASHINGTON, D.C. 20240

JUN 10 1982

Memorandum

To: Chief, Federal Wildlife Permit Office

From: Chief, Office of the Scientific Authority

Subject: Importation of Leopard Trophies

The Scientific Authority advises the Management Authority that the importation of sport-hunted leopard (Panthera pardus) trophies taken in the following countries will be for purposes that are not detrimental to the survival of the species involved: Botswana, South Africa (Transvaal only), Tanzania, Zambia, and Zimbabwe. This advice applies to all leopard trophies lawfully taken in these countries on or after July 1, 1975, provided they are to be imported by the persons who hunted them for personal use or display.

Basis for Advice:

1. The factors that were considered in developing advice on leopard trophy imports are set forth in an attachment to our memorandum of March 25, 1982 (copy attached). Advice was developed in accordance with a resolution of the Parties on this subject (Conf. 2.11).

2. Each of the five countries mentioned above: (a) has laws under which the regulated sport-hunting of leopards is allowed, (b) limits the quantity, or spatial or seasonal distribution of the take of leopards, (c) bases these limits on the goal of managing leopards to sustain their populations, (d) maintains a licensing system for persons who take or process leopards (except in South Africa), and (e) implements a permitting system to regulate trade in accordance with CITES.

3. Our advice is based on a comprehensive review of the best available information on the status and management of the leopard in each of the 18 countries where it is classified as a Threatened species under the U.S. Endangered Species Act of 1973. We have information that sport-hunting of leopards is not permitted in 9 of these countries: Angola, Burundi, Gabon, Kenya, Lesotho, Malawi, Rwanda, Swaziland, and Uganda. We do not now have enough information to advise on Namibia. The available information indicates that it would not be appropriate to allow leopard trophy imports from Congo, Mozambique, or Zaire.

4. In the case of those countries not presently allowing the sport-hunting of leopards, we do not find it appropriate to advise in favor of importing specimens that were taken prior to a hunting ban. Circumstances that led to such bans were operating against the conservation of leopards in those countries. A detailed account of such circumstances in Kenya is provided by Patrick Hamilton's 1981 report to the Service on the status of the leopard and cheetah in that country.

5. We will continue to review information on the leopard, and may amend this advice as necessary. Please send us a copy of each permit issued under this advice, so that we can monitor the number of trophies imported from each country.

Richard L. Jachowski
for the Scientific Authority

Concur: Richard M. Smith 6/15/82
Associate Director-Research Date

Attachment

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

AUG 1 4 2012

MEMORANDUM

To: Chief, Division of Management Authority

From: Chief, Division of Scientific Authority Rosemarie Gnam

Subject: General Advice on Importation of Sport-hunted Trophies of African Elephants from Tanzania for the Calendar Year 2012

This responds to your request for a finding as required under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) on various applications for the importation of sport-hunted trophies of African elephants (*Loxodonta africana*) from the United Republic of Tanzania (Tanzania) for calendar year 2012.

Please be advised that, with the information currently available, we are able to find that the importation of sport-hunted trophies of African elephants from Tanzania will be for purposes that are not detrimental to the survival of the species. This General Advice applies only to sport-hunted trophies of African elephants that were lawfully taken in Tanzania during calendar year 2012 (i.e., January 1, 2012, through December 31, 2012), provided that they are to be imported by the persons who hunted them for personal use or personal display.

If new information becomes available during 2012 that suggests that this General Advice is no longer valid, it will be suspended and reconsidered by the Division of Scientific Authority. If, after reconsideration, the Division of Scientific Authority believes that the General Advice is no longer valid, we will issue a new General Advice or require that subsequent permit applications be considered on a case-by-case basis.

BASIS FOR ADVICE:

A significant amount of information relevant to this General Advice was made available at the Fifteenth Meeting of the CITES Conference of the Parties (CoP15), including Tanzania's proposal to transfer its population of African elephants from Appendix I to Appendix II (CoP15 Prop. 4 (Rev. 1)), in addition to the Report of the Panel of Experts on Tanzania's proposal (CoP15 Doc. 68, Annex 6a). Much of the information used in making the current finding was derived from these sources, as noted below.

In addition, since CoP15, a significant amount of new information relevant to this issue has become available, including:

TAKE PRIDE IN AMERICA

- Tanzania National Elephant Management Plan 2010-2015 (TAWIRI 2012);
- The Wildlife Conservation Act, 2009 (Government of the United Republic of Tanzania 2009a);
- The Wildlife Conservation Act, 2009 (Act Supplement No. 5; 20th March, 2009; Government of the United Republic of Tanzania 2009b);
- The Wildlife Conservation (Tourist Hunting) Regulations, 2010 (Subsidiary Legislation Supplement No. 25; 2nd July, 2010; Government of the United Republic of Tanzania 2010);
- Third African Elephant Meeting (1-3 November 2010; Gigiri, Kenya; various documents); and
- Documents from the 62nd Meeting of the CITES Standing Committee (Geneva 2012).

Much of the information used in making the current finding was derived from these sources, as noted below, as well as previously cited information (see AOSA106; dated July 23, 2010; [Division of Scientific Authority 2010]).

Conservation and Management

1. African elephants are widely distributed throughout Tanzania, covering 49% of the country's land area. About 37% of the elephant's range in that country is in protected areas (PA). This proportion of protected range is relatively high compared to other African elephant range countries (Blanc *et al.* 2007). These protected areas comprise 26% of the country's land area within six ecosystems throughout the country, including: Tarangire-Manyara, Serengeti, Selous-Mikumi, Ruaha-Rungwa, Katavi-Rukwa, and Moyowosi-Kigosi. The network of PAs includes 15 National Parks (NP) (4% of the country's land surface), Ngorongoro Conservation Area (1%), 28 Game Reserves (GR) (14%), and 33 Game Controlled Areas (GCA) and/or Wildlife Management Areas (WMA) (5%). Some of these areas were designated as recently as 2005 (CoP15 Doc. 68, Annex 6a [page 1]).

2. In Tanzania, the only consumptive use of African elephants is sport hunting [CoP15 Prop. 4 (Rev. 1)], which is covered by The Wildlife Conservation (Tourist Hunting) Regulations, 2010 (Government of the United Republic of Tanzania 2010). These regulations control hunting by concession area, season, minimum trophy sizes (18 kg and 160 cm per tusk), annual quotas, post-hunt reporting, trophy registration, marking, and export requirements [CoP15 Doc. 68 Annex 6a [page 11]; Part V, Regulation 24.-(5)(b)].

3. The trophy quota for African elephants is distributed among approximately 150 hunting concessions/blocks [Ministry of Natural Resources and Tourism (United Republic of Tanzania), in litt., 2008] with the number of trophy permits allotted to each concession determined by elephant survey information (Ministry of Natural Resources and Tourism, in litt., 2005).

4. According to the Ministry of Natural Resources and Tourism (in litt., 2008), 25% of the revenue accrued from the sport hunting of elephants goes to the conservation and protection of

African elephants and other wildlife species through the Tanzania Wildlife Protection Fund (TWPF). In addition, 25% of the game fees received from hunters is given to the local communities in the areas where the sport hunting took place. Apart from being the source of revenue to local communities, sport hunting plays an important role in creating employment for the members of the local communities, for example, as trackers, skinners, tent and mess attendants, and guards (Ministry of Natural Resources and Tourism, in litt., 2008). The Ministry of Natural Resources and Tourism (in litt., 2008) also reported that the sport hunting program assisted in curbing illegal harvesting and developing infrastructure such as roads, hospitals, and schools, as well as creating a market for local artwork.

5. The 1998 Wildlife Policy of the United Republic of Tanzania was revised in 2007 and provides guidelines for the management of African elephants through the development, review, and updating of specific management plans (CoP15 Doc. 68, Annex 6a [page 4]).

6. This past year, Tanzania published its country-level strategy and action plan, the "Tanzania National Elephant Management Plan 2010-2015." This plan provides updated information on several biological and ecological topics, including: distribution and range, abundance, population trends and demography, elephant corridors, and human-elephant conflicts. It identifies nine different strategic objectives, as well as numerous specific objectives and their associated targets, actions, timelines, actors, and indicators. The strategic objectives include: Human-Elephant Conflict, Elephant Corridors, Law Enforcement, Benefits and Sustainable Utilization, Ivory Stockpile and Management System, Research and Monitoring, Elephant Health and Welfare, Cross-border Cooperation, and Elephant Information Management (TAWIRI 2012).

Population Status and Trends

7. In 2006, the Tanzania Wildlife Research Institute [TAWIRI 2007 (cited in CoP15 Doc. 68, Annex 6a [page 1])] estimated the African elephant populations of Tanzania at 139,915 ± 12,338 (SE) animals based on census surveys covering 227,328 km^2 conducted using both total and sample counts. According to the Panel of Experts, this estimate was not significantly different from that of 111,475 ± 18,728 (95% CL) elephants estimated in 2000-2003. The Panel of Experts noted that the 2006 estimate did not include 2,873 additional elephants from areas not formally surveyed, which provided a country-wide "best estimate" of 142,788 ± 12,405 (SE) elephants in 2006 (CoP15 Doc. 68, Annex 6a [page 1]). In 2006, according to the African Elephant Status Report (Blanc *et al.*, 2007), the "definite" category estimate was 108,816 elephants, in addition to 27,937 "probable," 29,350 "possible," and 900 "speculative" category estimates.

8. In 2009, a similar survey covering 229,318 km^2 across the same six ecosystems produced a total population estimate of 105,439 ± 6,080 (SE) African elephants [TAWIRI 2010a (cited in CoP15 Doc. 68, Annex 6a)]. A "best estimate," which included an additional 3,583 elephants, provided a country-wide estimate of 109,022 ± 6,135 (SE) elephants in 2009. The Panel of

Experts noted that these results suggested a significant decline compared to the 2006 estimate of 142,788 elephants and that the decline could be attributed largely to a downward population trend recorded in the Selous-Mikumi ecosystem (CoP15 Doc. 68, Annex 6a [page 1]); however, Tanzania later clarified that methodological issues during the 2006 survey is believed to have resulted in an overestimate, and therefore, the two years' results cannot be compared due to different study techniques. Although a survey was also conducted in 2011, the final survey report is not yet available (SC62 Inf. 1).

9. Demographic parameters were calculated between 2009 – 2010 from 2,182 African elephants from six major elephant populations in Tarangire, Serengeti, Ruaha-Rungwa, Selous, Katavi-Rukwa, and Ugalla (TAWIRI 2012). This demographic survey of African elephants revealed that the proportion of the population < 5 years of age varied from 41% in Tarangire to 25% in Ugalla River Game Reserve, with values above 30% (Tarangire, Selous, Serengeti, and Ruaha-Rungwa). These results were indicative of good to high growth rates. The Panel of Experts, citing Foley and Faust (2010), further pointed out that Tarangire had a growth rate of > 6% and was one of the highest growth rates ever recorded for an African elephant population. It was noted that those populations with the proportion of their herds < 5 years of age below 30% (Katavi and Ugalla Game Reserve), which is indicative of low recruitment and growth rates, suggested one or more population stressors, such as higher infant mortality or increased stress associated with human-elephant conflict or illegal activity (i.e., poaching) (CoP15 Doc. 68, Annex 6a [pages 1-2]).

10. The Panel of Experts concluded that while estimates at that time suggested that the Tanzanian African elephant populations were stable or possibly decreasing, elephant populations still remained large (> 100,000 individuals) and were demographically healthy. The Panel of Experts noted that the populations of African elephants were geographically widespread across the country and occupied diverse ecosystems, and that a high proportion of the populations (> 80% individuals) occupied protected areas. In the overall opinion of the Panel of Experts, the African elephant populations in Tanzania were viable at the time of the analysis (CoP15 Doc. 68, Annex 6a [page 2]).

11. The Panel of Experts, however, raised concerns about the future mobility of the African elephant populations in Tanzania. They noted, for example, that associated human settlements were increasing in size and number around protected areas and were accompanied by increasing human-elephant conflicts. These settlements and the associated conflicts were probably the most important factors limiting the elephants' mobility and range. It was the opinion of the Panel of Experts that -- at the rates of habitat change and land conversion at the time -- the corridors that still remained in Tanzania would be converted to unsuitable habitat in less than 5 years (CoP15 Doc. 68, Annex 6a [page 4]).

12. According to Jones et al. (2009), Tanzania was working to minimize risks to African elephants, other wildlife, people, and property through improvements in spatial planning involving the identification, maintenance, and restoration of wildlife corridors. The "Tanzania

National Elephant Management Plan 2010-2015" lays out a strategic objective to restore lost corridors and to increase protection for corridors that are identified to still be in use (TAWIRI 2012).

Sustainability of Off-Take

13. In Tanzania, African elephant deaths occur as a result of several factors, including: 1) natural mortality; 2) trophy hunting; 3) problem animal control; and 4) poaching. In order to evaluate whether off-take from trophy hunting was sustainable, all losses to the African elephant population must be considered.

Legal Off-Take

14. Since 2007, the annual CITES Export Quota for the United Republic of Tanzania has been 400 tusks (sport-hunting quota of 200 elephants). During 2003-2006, the quota was 200 tusks from 100 individuals, while during 1997-2002 the quota was 100 tusks from 50 individuals. Tanzania, however, typically has not exported its full quota allotment in sport-hunted trophies or African elephant tusks. During 1997-2009, for example, annual tusk exports typically were about 40-45% of the allowed quantities and never exceeded the approved annual quota (UNEP-WCMC CITES Trade Database; available on the internet at: http://www.unep-wcmc.org/citestrade; accessed on 8 March 2010).

15. The Panel of Experts also assessed the sustainability of legal off-take from African elephant populations in Tanzania. Complete records on natural mortality for the entire country or on the killing of problem elephants were not available, but the Panel of Experts was able to estimate the level of such off-take by analyzing the data from the ivory store databases of Tanzania. Based on 21 years of data for that country, an average of 231 elephants died annually from natural mortality, while another 287 individuals died annually from elephant control measures (CoP15 Doc. 68, Annex 6a [page 5]).

16. Based a sport-hunting quota of 200 African elephants, as well as the estimates cited earlier for natural mortality and problem animal control in Tanzania, the Panel of Experts estimated that the overall legal off-take of African elephants from the several populations in that country was about 718 annually, which was 0.7% of the 2009 elephant population estimate of 109,022 individuals. Even if natural mortalities were considerably higher due, for example, to low carcass detection rates by observers in difficult terrain, the Panel of Experts believed that the legal off-take was still less than the annual population growth rate of 3-5% and, therefore, was sustainable (CoP15 Doc. 68, Annex 6a [page 14]).

17. The Panel of Experts also assessed whether the hunting of trophy-quality males in Tanzania was sustainable. According to an earlier analysis by Martin (1986), an annual harvest rate of 0.5-1.0% of the total African elephant population was sustainable. Based on the available population information, the Panel of Experts estimated that nationwide there was a potential off-take of 325 trophy-quality African elephant males (0.3% of the total population; CoP15 Doc. 68,

Annex 6a [page 14]). The Panel of Experts noted that this value of 0.3% was less than the value of 0.5-1% of total African elephant numbers and concluded that the hunting was sustainable.

Illegal Off-Take

18. According to the Panel of Experts, official poaching statistics provided by the Wildlife Division of Tanzania indicated 258 reported poaching incidents that were detected during 2005-2009, including 82 poaching incidents in 2009, the highest number poached annually during that time period. The Panel of Exports noted, however, that the total number of poaching incidents was likely underestimated given low African elephant carcass detection rates (CoP15 Doc. 68, Annex 6a [page 5]).

19. The Panel of Experts cited the following evidence that poaching has led to elephant population declines in the Selous-Mikumi ecosystem:

> *a) PIKE values collected at the Selous-Mikumi MIKE site have progressively increased between 2003 and 2009 (CITES Secretariat, 2010).*
>
> *b) Joint Wildlife Division/Selous Rhino Project aerial observations and foot patrols recorded more than a threefold increase in encounter rates of recently dead elephant carcasses between 2007 and 2008 (TAWIRI, 2010b).*
>
> *c) Tourism operators operating in the northern Selous reported to the Panel an increase in elephant (and other wildlife) poaching since 2007/8, including several incidents close to tourist camps.*
>
> *d) A significant proportion of the large seizures of ivory made in Asia in 2006 have been traced by forensic DNA work to elephants killed in the Selous-Niassa area (Wasser et al., 2009).*
>
> Note: PIKE = Proportion of illegally killed elephants

20. The Panel of Experts also pointed to evidence that the Selous-Mikumi ecosystem was a "hotspot" for African elephant poaching. They observed that the ivory that had been collected by wildlife enforcement officials at Udzungwa National Park was from confiscations. According to these officials, the confiscations consisted of illegally-sourced ivory coming out of nearby Kilombero Game Controlled Area in the Selous-Mikumi ecosystem. In addition, the highest number of tusks confiscated by field-based Wildlife Division offices originated from Morogoro and Lindi, which are adjacent to the Selous-Mikumi ecosystem (CoP15 Doc. 68, Annex 6a [page 5]).

21. Given the factors discussed above, the Panel of Experts concluded that the level of off-take at that time was not sustainable in the Selous-Mikumi ecosystem, which represents about 40% of the total African elephant population in Tanzania. They also noted, however, that legal and

illegal off-take appeared to be sustainable in the five other elephant ecosystems where the populations were stable or increasing. Expressing concern about the potential for off-take levels in the Selous-Mikumi ecosystem to have a future negative impact on the African elephant population as a whole, the Panel of Experts stated:

> *"Whilst not unequivocally substantiated, the Selous-Mikumi situation described above could affect long-term population sustainability."* ,
> (CoP15 Doc. 68, Annex 6a [page 3])"

22. Based on a more recent analysis of MIKE data, the levels of illegal killing across the African elephants' range are of serious and increasing concern. Between 2009 and 2011, PIKE values remained high at the Selous-Mikumi MIKE site (SC62 Inf. 1). Moreover, a March 2012 IUCN African Elephant Specialist Group survey indicated that poaching over the last 12 months had increased in sites in Tanzania (SC62 Doc. 46.1 (Rev. 1).

23. Another concern that the Panel of Experts raised, which relates to the commitment by the Tanzania to combat poaching, was the financial mechanism by which the Wildlife Division was funded. The Wildlife Division's revenue share is paid directly to the central Treasury, and the Treasury is then supposed to distribute the budgeted monies to the Wildlife Division. The Panel of Experts raised the concern that over a 3-year period (2007-2009), the Wildlife Division had received only 63% (USD 2,634,975 per year) of its approved budget from the central Treasury. The Panel noted that given these funding limitations, the Wildlife Division would not be able to meet its needs and obligations regarding the conservation, management, and protection of African elephants. The Panel of Experts also noted, however, that between 2005 and 2009, the Tanzania Wildlife Protection Fund contributed on average a total of USD 12,894,564 annually to the Wildlife Division. According to the Panel of Experts, these funds, when combined with the Treasury allocations, should have put the Wildlife Division in a "strong position" to meet its enforcement obligations, including containment of threats to elephants in the Selous-Mikumi ecosystem (CoP15 Doc. 68, Annex 6a [page 3]). Recent African elephant poaching levels in the Selous-Mikumi ecosystem, however, suggest that enforcement may have been inadequate.

24. The Panel of Experts also noted that the National Parks and the Ngorongoro Conservation Area Authorities of Tanzania were adequately funded because they generated and retained 100% of their revenue share through park and conservation area fees (CoP15 Doc. 68, Annex 6a [page 3]).

25. Although the Panel of Experts raised concerns over the illegal killing of elephants in the Selous-Mikumi ecosystem, they also acknowledged the efforts by authorities of Tanzania to combat the increases in poaching. For example, in July 2009, a series of planning meetings led to anti-poaching patrols that were joint and cooperative, and involved rangers and scouts from the Selous Game Reserve, the Udzungwa Mountains National Park, and the Mikumi National Park. In December 2009, for example, the commander of special police operations led an anti-poaching operation, code-named "Operation Butterfly," in the Selous Game Reserve. This operation led to the arrest of 70 poachers and the recovery of elephant and hippopotamus ivory

(Midala 2010, *as cited in* TAWIRI 2012). Noting these, as well as other anti-poaching efforts by the Tanzanian authorities, the Panel of Experts stated:

> *"There is a clear indication of concern by the authorities to minimize poaching of elephant and other wildlife species. The various efforts to deploy staff and execute special anti-poaching operations in various parts of the country, particularly in the vast Selous Game Reserve, are noteworthy."*
> (CoP15 Doc. 68, Annex 6a [page 14]).

26. The Director of Wildlife of Tanzania informed the Panel of Experts that regulations were being finalized to implement The Wildlife Conservation Act, 2009, which would reportedly increase revenue retention, increase penalties up to 30 years, and provide additional powers to law enforcement personnel (CoP15 Doc. 68, Annex 6a [page 11]). Copies of those laws and regulations were provided to the U.S. Fish and Wildlife Service (Service) at a February 17, 2011, meeting with Tanzanian officials.

27. The "Tanzania National Elephant Management Plan 2010-2015" is based on several new wildlife laws and implementing regulations (TAWIRI 2012): The Wildlife Conservation Act, 2009 (Government of the United Republic of Tanzania 2009a); The Wildlife Conservation Act, 2009 (Act Supplement No. 5; 20th March, 2009; Government of the United Republic of Tanzania 2009b); and The Wildlife Conservation (Tourist Hunting) Regulations, 2010 (Subsidiary Legislation Supplement No. 25; 2nd July, 2010; Government of the United Republic of Tanzania 2010). During the February 2011, meeting, the Service received copies of these measures, but it was not clear when they would be fully implemented. For example, the Subsidiary Legislation (Supplement No. 25; 2nd July, 2010) of The Wildlife Conservation (Tourist Hunting) Regulations, 2010, in Part V, 24.-(5)(b), directs that no person shall hunt an elephant with tusks weighing below 18 kg per tusk or measuring not less that 160 cm per tusk (Government of the United Republic of Tanzania 2010). In another example, the Act Supplement (No. 5; 20th March, 2009) of The Wildlife Conservation Act, 2009, in Part IV, calls for the protection of wildlife corridors, dispersal areas, buffer zones, and migratory routes (Government of the United Republic of Tanzania 2009b). Both of these measures are critically important to the conservation of the African elephant, but it is not clear when they will become operational and backed by the force of law in Tanzania. Until the new laws are fully implemented, these African elephant conservation and management measures, while improving, are still in a transitional phase.

Conclusion

28. With the information currently available, we believe that the status of the African elephant population in Tanzania and ongoing management efforts in that country are adequate to ensure that the sport hunting of African elephants, as administered by the Government of the United Republic of Tanzania, does not adversely affect the status of the species in Tanzania.

29. Therefore, for calendar year 2012, we find that the import of sport-hunted trophies of African elephants taken in Tanzania will be for purposes that are not detrimental to the survival of the species.

CONCERNS:

Although we are able to make the current non-detriment finding, we still have concerns about the future sustainability of the total levels of off-take from the African elephant populations in Tanzania. These concerns – in part -- were also noted by the Panel of Experts (CoP15 Doc. 68, Annex 6a [pages 13-16]):

A. Efforts have been made by Tanzania to combat poaching in the Selous-Mikumi ecosystem. We also acknowledge that additional resources are now available to promote the conservation status of the African elephant in that country, including: "Tanzania National Elephant Management Plan 2010-2015" (TAWIRI 2012); The Wildlife Conservation Act, 2009 (Government of the United Republic of Tanzania 2009a); The Wildlife Conservation Act, 2009 (Act Supplement No. 5; 20th March, 2009; Government of the United Republic of Tanzania 2009b); and The Wildlife Conservation (Tourist Hunting) Regulations, 2010 (Subsidiary Legislation Supplement No. 25; 2nd July, 2010; Government of the United Republic of Tanzania 2010). The Service is interested in receiving an update on whether the management and regulatory measures mentioned above have been fully implemented, and if not, the targeted time period for full implementation of these measures. In particular, we remain concerned about the availability of future resources to combat poaching in Tanzania, especially in the Selous-Mikumi ecosystem. In this regard, we are interested in receiving updated information on recent initiatives and their effectiveness in combating poaching in Tanzania, particularly in the Selous-Mikumi ecosystem.

B. It is our understanding that the elephant population in the Selous ecosystem in Tanzania was surveyed in 2011 but that the results have not yet been available. We are interested in receiving these results as soon as they are available.

C. We note that most of the 23 known elephant corridors in Tanzania are in poor condition (TAWIRI 2012). We recognize that the "Tanzania National Elephant Management Plan 2010-2015" includes a strategic framework for increasing protection for these corridors and for restoring lost corridors and that laws and regulations are available to protect these corridors. Given the importance of protecting these corridors from ongoing threats and the risks to the African elephant populations in the future as a result of human-elephant conflict in and around these areas, we are interested in receiving updated information on Tanzania's success to date in achieving its objectives related to the protection of African elephant corridors, as laid out in the "Tanzania National Elephant Management Plan 2010-2015" (TAWIRI 2012).

D. Based on recent information obtained through the National Website of Tanzania, we understand that new procedures have been implemented regarding the allocation of tourist hunting blocks [see: Invitation For Applications For Tourist Hunting Blocks Allocation For The Period 2013 – 2018; (Made under Section 9 (2) of the Wildlife Conservation Act, Cap.283 (Tourist Hunting Regulations of 2010); http://www.tanzania.go.tz/ministriesf.html; accessed on March 9, 2011); Government of the United Republic of Tanzania 2011]. These changes deal primarily with the hunting block fees that will be charged by the government. We are interested in receiving information about these changes and how they could affect African elephant harvest quotas or off-take levels associated with the corresponding hunting blocks. Given the recent uncertainty about the total population sizes and trends of African elephant populations in the United Republic of Tanzania, especially in the Selous-Mikumi ecosystem, we will continue to monitor African elephant population survey results, as well as overall harvest quotas and off-take levels for this species in the United Republic of Tanzania.

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Department of the Interior
U.S. Fish and Wildlife Service

Expires 11/30/2010
OMB No. 1018-0093

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Rondeau	Catherine	Hammond	MRS

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b)(6)	(b)(6)	(b)(6)	

6.a. Telephone number (b)(6)

B. Complete if applying on behalf of a business, corporation, public agency or institution

1.a. Name of business, agency, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, or institution

4.a. Principal officer Last 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)(6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Leonard	MI	48367	Oakland County	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b)(6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Oakland	MI	48363	Oakland County	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** Federal, tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held ~~or that you are applying to renew/re-issue.~~ 10US25986A/9 I had and used
No ☐ a permit in 2010 for an elephant + another in 2010 for a leopard.

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 o (b) (6) he criminal penalties of 18 U.S.C. 1001.

Signature (b) (6) ures) Date of signature (mm/dd/yyyy) 9-12-2012

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. NO NO

I am requesting a new elephant a new leopard permit fo

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: 1 (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: 0 (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: Tanzania's Selous Reserve
   b. Date wildlife is to be hunted: Nov. 2 - 24, 2012
   c. Description of the trophy and/or parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn): Leopard = full body skin with claws, skull, teeth. Elephant = 2 tusks, 2 ears, 4 feet, 1 trunk, tail with ha
3. **IF THE ANIMAL IS DEAD**, please enter the following: full body skin, four teeth
   a. Country and place (area, region, or ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):
   b. Date wildlife was hunted:
   c. Description and size of the trophy and/or parts (e.g., skin, skull, shoulder mount, life size mount, claws, horn):
   d. The current location of the trophy (address and country):
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: Tanganyika Wildlife Safari

Address: Uhuru Street, Plot-38, near Buguruni Police Post

City/Country: P.O. Box 21880
Buguruni Kisiwani, Dar-es-Salaam, Tazania, Eas

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. Afri

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 yonr own trophy**, please read and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for 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: 9-12-12

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 ☐
   The outfitter in Tanzania is holding my hunting license on my behalf
9. Enter the U.S. port through which the [export/re-export/import] will occur. New York City
   (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. A list of designated ports (where an inspector is posted) is available from [illegible])

10. Address where you wish permit mailed (if different than page 1):
    (b)(6) Oakland, MI 48363, USA
    (same as on page 1)

11. If you wish the permit to be sent to you by means other than regular mail, provide an air bill, pre-paid envelope, or billing information:
    N/A

12. Who should we contact if we have questions about the application? (Include name, phone number, and email):
    Catherine Rondeau (b)(6)
    (b)(6)

Form 3 (Rev. 1/2012)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 2

1. Original Permit/Certificate No.
12US681621A/9

2. Valid until
10/31/2013

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b)(6)
LEOPARD, MI 49837
U.S.A.

4. Consignee (name and address, country)
TANGYANIKA WILDLIFE SAFARI
UHURU STREET, PLOT 38
NEAR BUGURUNI POLICE POST, P.O. BOX 21660
BUGURUNI MSIMANI
DAR ES SALAAM
TANZANIA

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.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-1547

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.

11/01/2012
Issuing Date

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 (applies if live)	10. Appendix No. and Source	11. Quantity (including units)	12. Country of Origin
A. Common Name: AFRICAN ELEPHANT Scientific Name: LOXODONTA AFRICANA	9. 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. I W	1 NO	TANZANIA
B. 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. I W	1 NO	TANZANIA
C. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted]	11. [redacted]	12. [redacted]
D. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted]	11. [redacted]	12. [redacted]
E. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted]	11. [redacted]	12. [redacted]

371235 USS 10/12 65

12US88593A/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.

U.S. CITES Management Authority

11/01/2012
Date

Chief, Branch of Permits
Division of Management Authority

371236

United States Department of the Interior
FISH AND WILDLIFE SERVICES
Washington, D.C. 20240

1849-1999

FL-1

June 6, 2013

Catherine Hammond Rondeau
(b)(6)
Leonard, MI 48367

Dear Ms. Hammond Rondeau:

On 04/12/2013, you were notified, and requested to provide additional information in regard to your application PRT- 88593A. In that request, you were informed that you needed to respond within 45 days or your application would be abandoned. Since we have not received the requested information, we have abandoned your application, and your application has been administratively closed.

If, in the future, you wish to pursue the activity for which you originally applied, you will need to submit a new application, along with any appropriate fees, to this office. Please be aware that in most cases, we will not "transfer" information from your old application to a new application. All relevant information would need to be supplied at the time a new application is submitted.

If we can be of assistance, you may contact our office at 703-358-2104 or fax 703-358-2281.

Sincerely,

Division of Management Authority
Branch of Permits

Form 3-200.37

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 2

1. Original Permit/Certificate No.
12US668923/9

2. Valid
10/31/2013

3. Permittee (name and address, country)
CATHERINE HOWMOND ROMEREAU
(b)(6)
LEONARD, MI 48367
U.S.A.

4. Consignee (name and address, country)
GERARD PAGANI SAFARIS
P.O. BOX 21522
DAR ES SALAAM
TANZANIA

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 AMENDS AND REPLACES 12US668923/9 ISSUED 11/01/2012.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
4401 N. FAIRFAX DRIVE
ROOM 212
ARLINGTON, VA 22203-1247

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.

03/12/2013
Issuing Date

U.S. CITES Management Authority
Issuing Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

7. Common Name and Scientific Name (genus and species) of Animal or Plant	8. Description of Part or Derivative, including identifying marks or numbers (specimen # for)	10. Appendix No. and Source
A. Common Name AFRICAN ELEPHANT Scientific Name LOXODONTA AFRICANA	9. 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 NO 12. Country of Origin TANZANIA
B. 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 TANZANIA
C. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
D. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]
E. Common Name [redacted] Scientific Name [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units) [redacted] 12. Country of Origin [redacted]

13US88593A/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.

09/12/2013
Date

U.S. CITES
Management Authority

Chief, Branch of Permits
Division of Management Authority

513416

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
14US88593A/9

2. Valid
09/16/2015

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b)(6)
LEONARD, MI 48367
U.S.A.

4. Consignee (name and address, country)
GERARD PASANISI SAFARI
P.O. BOX 21880
DAR ES SALAAM
TANZANIA

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.

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

-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.

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 ELEPHANT Scientific Name LOXODONTA AFRICANA	9. 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 NO 12. Country of Origin TANZANIA
B. 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 TANZANIA
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

4/8614

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

478619

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
19US88593A/9

2. Valid
07/10/2020

3. Permittee (name and address, country)
CATHERINE HAMMOND RONDEAU
(b) (6)
ANN ARBOR, MI 48105
U.S.A.

4. Consignor (name and address, country)
GERARD PASANISI SAFARI
P.O. BOX 21880
DAR ES SALAAM
TANZANIA

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 **2012** 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

U.S. CITES Management Authority

07/11/2019
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 jewerly, that must accompany raw or tanned parts.)	10. 1 W 11. Quantity (including units) 1 NO 12. Country of Origin TANZANIA
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

847374

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 26 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Hardman	Paul	W.	—

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

2. Tax identification no.	3. Description of business, agency, Tribe, or institution		

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Lehi	Utah	84043-6044	Utah	USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. (b) (6) ...the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ...tify that the information submitted in this application for a permit is complete and accurate to the ...ent herein may subject me to the criminal penalties of 18 U.S.C. 1001.

02-10-2018
...ied 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: 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
   Leopard — Okakango Ptn 4 #58 — 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-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.
   POBox 81413
   Olympia, Windhook 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-Windhook,
State/Province:	Republic of Namiba
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 ivo[redacted] not be re-exported.

Applicant's signature: [redacted] 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 [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.

Form 3-200-19

OMB Control No. 1018-0093
Expires 08/31/2020

JAN 28 2019

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES 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	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Hardman	Paul	W	

(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.a. Physical address (include if different than mailing address; include name of contact person if applicable; include Apt #, Suite #, or Room #; no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Lehi	Utah	84043	Utah	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the **amount of $100.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 12/27/2018

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.**

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)?

Paul Hardma[redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☒ No ☐ Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. 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: na (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).

c. Elephant 11-7-2016 to 11-21-2016

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:

Mangetti, Park Winhock, Namibia

   e. Date wildlife was hunted: 11-7-2016 to 11-21-2016

   f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Thormanlen and Cochran Nel Nelson

   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]:

The Yellow Shark Holdings (pty) ltd. PO Box 81413 Olympia-Windhook, Republic of Namibia, 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:	The Yellow Shark Holdings PO Box 81413 Olympia, Republic of Namibia, Namibia
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: [redacted] Date: 12/27/2018

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.

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

PERMIT / CERTIFICATE No.

X EXPORT

RE-EXPORT

IMPORT

OTHER:

0055575

Original

2. Valid until:

3. Importer (name and address)

(b) (6)

4. Exporter / Re-exporter (name,address and country)

(b) (6)

Signature of the applicant

3a. Country of import

5. Special conditions

Not valid if not certified by the Namibian customs

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 ENVIROMENT AND TOURISM
Directorate: Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse)

5c. 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 any)	*10. Appendix No and source (see reverse)	*11. Quantity including unit	*11a. Total exported/ Quota
A	Loxodonta africana African elephant	2x Tusks	I W	2 item	
	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. skull, cape, tail, 2x ears & 1x foot	10.	11. 3 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. Loxodonta africana African elephant	9. 2x tusks	10.	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 ***	
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

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
07 MAR 20[illegible]
Private Bag 13306 Windhoek
Tel: 264 61 23[illegible] Fax: 250961
Security stamp, signature and official function

Windhoek
Place

[illegible]
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

Nanpanl 2 bis

Republic of Namibia

MINISTRY OF ENVIRONMENT AND TOURISM

Tel: +264-61-284 2111
Fax: +264-61-259101
E-mail: iifo.fillemon@met.gov.na; 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
Paul Walker Hardman **9971 Redwood Road** **84045 Leki, Utah** **U.S.A**	**Nelson Nel** **P.O. BOX 90911** **Windhoek** **Namibia**

A) Obtained the following trophy/trophies, in accordance with the Namibian National Legislation on **17/03/2017** with hunting permit number **168299**

B) The export of this specimen(s) is not detrimental to the survival of the Namibian **Leopard** population.

TYPE OF TROPHY
----------**skull, jaw & skin**----------

The trophy is marked with the following tag number: **NAPP 11/250 (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.

Licensing official

MINISTRY OF ENVIRONMENT AND TOURISM
REPUBLIC OF NAMIBIA
06 -04- 2018
Private Bag

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
SHANE MAHONEY
RENEE SNIDER

August 21, 2018

U. S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RCVD AUG 23 2018

RE: RE: Import application for Tanzania Lion Trophy, Todd Cusick

Dear Chief Cogliano:

Enclosed please find the application to import a lion trophy that will be hunted between July and October of 2019 in the Rungwa Mpera Hunting Block of Tanzania. The applicant, Todd Cusick, will be hunting with Michael Angelides of Old Nyika Safaris Ltd. Please refer to the hundreds of pages of enhancement information Conservation Force has previously submitted to DMA including the Operator Enhancement Reports for Old Nyika Safaris for the years 2016 and 2018 (copies also attached here), as well as information submitted by Tanzania authorities, outfitters, and others, in making an enhancement finding for lion trophy imports from Tanzania.

Please do not hesitate to contact us if you have questions about this permit application.

Sincerely,

John J. Jackson III

encl:

- Cusick import permit application and Notice of Representation
- Old Nyika Safari's 2016 Operator Enhancement Report
- Old Nyika Safari's 2018 Operator Enhancement Report
- Map of Rungwa Mpera G.R. Hunting Block GPS Coordinates 2013-2018

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: cf@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted African Lion trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6)

Name: Todd Cusick

Date: 8-1-18

RCVD AUG 23 2018

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
CUSICK	TODD	DENNIS	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
PROVO	UTAH	84604		USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) 08/01/2018

continue to next page

OMB Control No. 1018-0093
Expires 08/31/2020

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(●) No ( ) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

PANTHERA LEO

b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

LUKWATI NORTH GAME RESERVE (1,748 square kms), CONCESSION IS IN CHUNYA DISTRICT, NEAREST CITY IS MBEYA. CHUNYA MSAMI, CHUNYA LUKWATI & PITI WEST (6,603 square kms) CONCESSIONS ARE IN CHUNYA DISTRICT. NEAREST CITY IS MBEYA. ALL LOCATED IN SOUTH WEST TANZANIA AND BORDER THE PITI AND THE RUNGWA RIVER.

b. Date wildlife is to be hunted:

BETWEEN JULY & OCTOBER 2019. SAFARI DATE TO BE FINALIZED.

c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

OLD NYIKA SAFARIS LTD.
MICHAEL ANGELIDES

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). HUNT TO TAKE PLACE IN 2019 AND PERMITS AND WILL BE PROVIDED ONCE OBTAINED AND THE HUNT IS COMPLETED.
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	OLD NYIKA SAFARIS LTD
Business Name:	OLD NYIKA SAFARIS LTD.
Address:	P. O. BOX 4
City:	ARUSHA
State/Province:	NOT APPLICABLE
Country, Postal Code:	TANZANIA

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

COMPANY AND AREA INFORMATION HAS BEEN PROVIDED THROUGH CONSERVATION FORCE AS PER ATTACHED DOCUMENTS, MAPS AND DATA.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

ESTIMATED LICENSE AND GOVERNMENT FEES TO BE PAID TO THE TANZANIAN GOVERNMENT - $6700. TROPHY FEE FOR THE LION THAT WILL BE PAID IF TAKEN - APPROXIMATELY $12,000. THE GOVERNMENT USES TROPHY FEES TO FUND GAME SCOUTS. THE OPERATOR APPLIES FUNDS TOWARDS COMMUNITY SUPPORT AND FUNDING OF ANTIPOACHING PATROLS BY PROVIDING A VEHICLE, FUEL FOOD RATIONS AND SUPPORTING PERSONELL.

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

DONATION OF TENTS TO ANTIPOACHING PATROLS, CONTRIBUTION TOWARDS GAME SCOUT ALLOWANCES PARTAKING IN ANTI POACHING PATROLS, DONATION OF IRON ROOFING SHEETS TO THE LOCAL COMMUNITY FOR THE BUILDING OF A SCHOOL, DEMARKATING BOUNDARIES AND BUILDING BEACONS TO CLEARLY MARK THE RESERVE BOUNDARIES AND DISCOURAGE HUMAN ENCROACHMENT.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

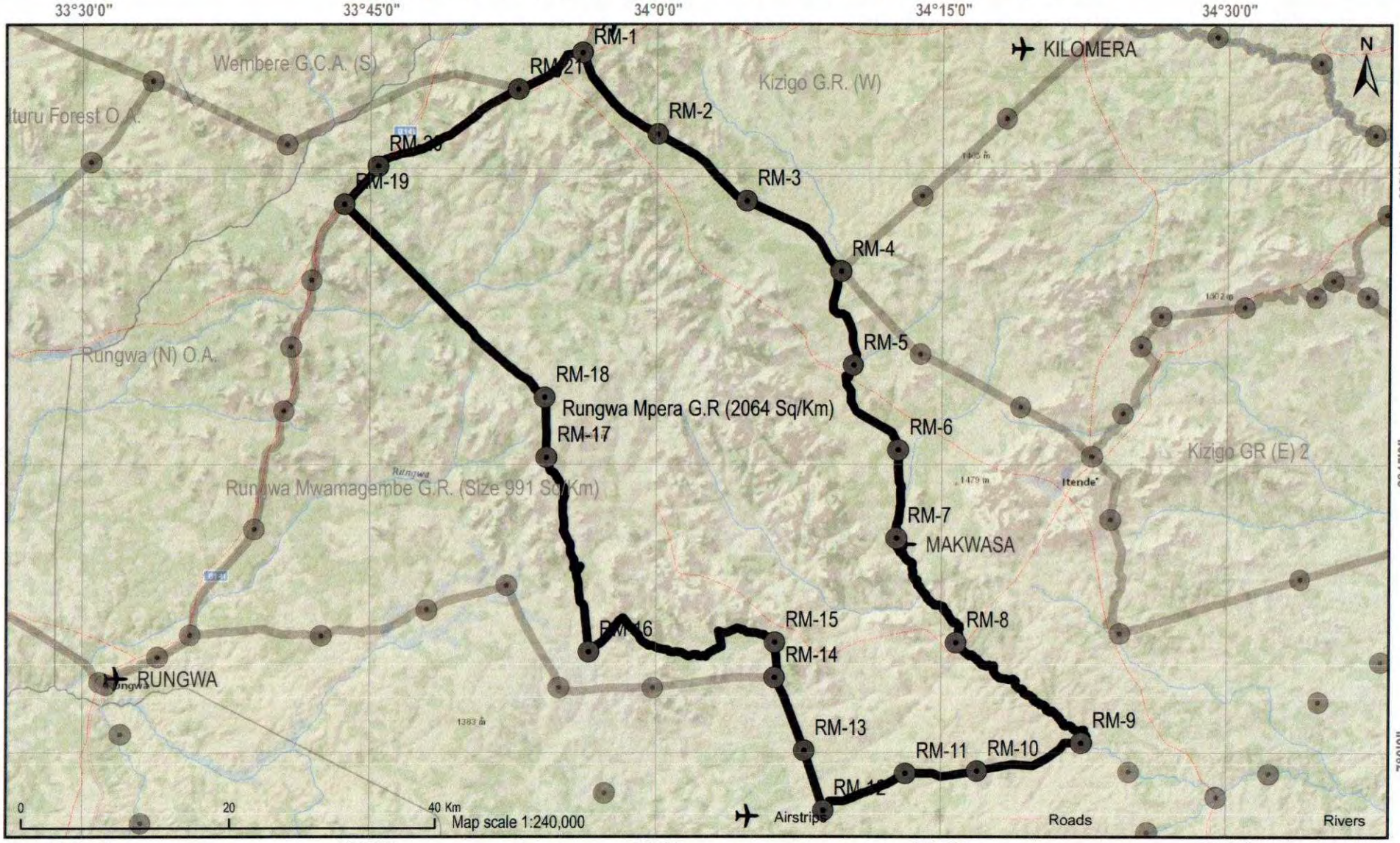
I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: (b) (6) Date: 08-01-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

RUNGWA MPERA G.R HUNTING BLOCK GPS COORDINATES: 2013-2018



GPS ID	RM-1	RM-2	RM-3	RM-4	RM-5	RM-6	RM-7	RM-8	RM-9	RM-10	RM-11	RM-12	RM-13	RM-14	RM-15	RM-16	RM-17	RM-18	RM-19	RM-20	RM-21
Latitude	-6.392	-6.463	-6.521	-6.582	-6.664	-6.737	-6.814	-6.904	-6.991	-7.016	-7.018	-7.05	-6.998	-6.935	-6.904	-6.912	-6.744	-6.692	-6.524	-6.491	-6.424
Longitude	33.935	34.001	34.079	34.162	34.173	34.212	34.211	34.263	34.374	34.282	34.219	34.147	34.13	34.104	34.104	33.941	33.904	33.903	33.727	33.757	33.879

Coordinate System: GCS, Datum: Arc 1960, Units: Degrees

Data source: TAWIRI, 2010

Map production: TAWIRI, 2012

Old Nyika Safaris and Safari Royal

LION HUNTING POLICY 2018

Age is the primary criteria in the selection of all hunting trophies, including lion.

The companies have a zero tolerance policy towards the shooting of young lions.

All Professional Hunters must be able to determine the approximate age of an adult male lion with a reasonable degree of accuracy. Pressure from clients or mistaken ageing are not acceptable excuses should an immature lion be harvested.

Studies of known age lion and standard aging criteria have established sufficient guidelines for field determination of whether a lion is older or younger than the 6 year legal standard.

The following points must be adhered to when hunting lion:

- 6 years of age is the recognized legal minimum for harvestable males
- Male lion must not be accompanied by a pride with cubs or sub-adult young
- Male lion must not be accompanied by a pride with lactating females, should cubs not be visible
- If the lion has a poor mane (i.e. a poor trophy) - then it must show visible signs of advanced age.
- Do not shoot marginal lion in the 5-6 year old category.
- Be careful not to take any obviously young lion even if they have fully developed manes.
- Do shoot - if you are convinced that a lion is 6 yrs + with visible signs of age - One that no one can reasonably question your decision to take it.
- A trophy lion should also pass the criteria that the majority of PH's would agree to it being harvestable.

No client is ever guaranteed to take any trophy – particularly lion.

The success rates for finding 6 year old trophy lion are notoriously low and can never be guaranteed.

The majority of recognized scientists concerned with the study of lion and sustainable lion hunting have endorsed the definition of a huntable lion as follows:

Huntable male lions are defined as those male lions whose off-take has no negative impact on the sustainability of local lion population dynamics. Research has shown that these are typically lions of 6 years of age or more that have completed their first breeding cycle. To reduce risks of infanticide, males of any age known to be heading prides with dependent cubs should not be hunted. Based on these considerations, a huntable male lion is at least six years of age and is not known to head a pride with dependent cubs.

Research models have demonstrated that selective trophy hunting does not alter wild lion population dynamics if restricted to males that meet the criteria of a huntable lion as defined above.

Please insure that you take as many clear photos of the lion as possible. These photos play a crucial role in aging lions, supplying inferior of badly taken photos will go against you in the aging process, make sure you clearly show.

Teeth – from the front, side and show the back of the canines for wear.

Face – front, side clearly show and scars.

Nose – close up and clear.

Mane - Side, front, top, chest.

Full Body – side, top, rear, in particular show any scars

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

Swarovski

1. Name of area operator: __Old Nyika Safaris _____
   a. Years in business: ____20 years_____
   b. Name of company conducting hunt: __Old Nyika Safaris _____
   2. Name of concession: Chunya Msami, Chunya Lukwati, Piti West

      Size in km^2: _6603_____
   a. Land tenure: __ Government lease _√ Community __ Private ranch __ Private conservancy
   b. Length of concession agreement: _____5 years_____ Can it be renewed? _√ Yes __ No
   c. Length of renewal, if applicable: ____5 years_____
   d. Estimated total amount received in trophy fees last year, if applicable: $124,490_____
   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: As per wildlife regulations and ACT, companies are required to contribute to anti poaching, block development and contribute a minimum of $5000 cash per concession towards community development. Each company is accessed on its contribution towards these 3
   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Nearest City Mbeya, concession is in the district of Chunya, Tanzania (Map attached)
   g. If the concession borders a national park, please provide the park name: NA
   h. Description of general and distinctive habitat features and any water features: Miombo Forest, concession borders the seasonal Rungwa River
3. Are there any communities living in the concession? _√ Yes __ No
   a. If so, estimated number of people or villages in the concession? 12,000_____
4. Are there communities bordering this concession? √ Yes __ No
   a. If so, estimated number of people or villages around the concession? 18,000
5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant				No study

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Lion				All observations are recorded by GPS, as attached
Leopard				All Observations are recorded by GPS, Pilot monitoring project in progress (2nd year)
Prey species				

6. Total employment number: _____27_____

   a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	2	1
Trackers	4-6	2-4
Anti-poaching scouts/rangers	4	2
Other anti-poaching	4	2
Cooks/housekeepers	8	7
Community coordinators	1	0
Managers	1	0
Biologists	0	0
Others: Camp Supervisor	1	0

7. Number of staff employed in the off-season: __13_____

   a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	3	2	All year
Managers	1	0	All year
Maintenance	1	0	All year
Road opening/construction	3-6	2	May- August
Community relations personnel	1	0	All year
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: __3_____

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? _both___

c. Months during which anti-poaching patrols are conducted: periodic - all year___

d. Number of anti-poaching patrols per month: __14 days at a time____

e. Description of anti-poaching equipment, vehicles, etc.: __1 Toyota land Cruiser pick up

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The company in co-ordination with Tanzania Wildlife Authority does prevention, Tanzania Wildlife Authority are solely responsible for prosecution

g. Do you offer rewards to poaching informants leading to arrest? _√ Yes __ No

h. Do you offer rewards to poaching informants upon conviction? __√ Yes __ No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? ___US$_____

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	$5,979.75	$8,867.95	$11,814.48	
Equipment	$71.25	$133.33	$234.00	
Vehicles	$3582.61	$2,585.47	$2979.78	
Petrol/fuel	$2635.50	$2,155.42	$3,389.53	
Rewards paid	N/A	N/A	N/A	Reward scheme implemented in 2018
Other: Legal fees	$423.75	N/A	N/A	
Other: _____				
TOTALS	$12,692.86	$13,742.17	$18,417.79	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	18	12	15	Camps and tracks
Elephant carcasses observed	2	0	0	
Lion carcasses observed	0	0	0	
Leopard carcasses observed	0	0	0	
Ivory poachers arrested	0	0	0	
Meat poachers arrested	0	0	0	
Other poachers arrested	2	4	6	Trespassers
Poachers convicted	unknown	unknown	unknown	Government information
Snares/gin traps collected	0	0	0	Snares/trap are not used in this region
Firearms confiscated	0	0	0	
Vehicles confiscated	0	0	0	
Bicycles confiscated	2	1	4	
Boats/nets confiscated	0	0	0	
Tusks recovered	0	0	0	

Other: Timber planks	250	5	0	

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? √ Yes __ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? $5000 cash ($5000 cash per concession yearly required by law) $2000 - $4000 voluntary contribution depending on projects and available funds

c. Does the company provide game meat to nearby communities? __ Yes √ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: ___NA_____

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. Government can only conduct this

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? _N/A_____

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant		N/A	N/A	N/A
Lion		N/A	N/A	N/A
Leopard		N/A	N/A	N/A
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____US$____

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	-	-	$324	
Education (e.g., school fees, supplies)	$357	$172.81	-	
Health (e.g., clinics, offices)	-	-	-	
Health (e.g., medical salaries, equipment)	$2100	-	-	
Community scout salaries	N/A	N/A	N/A	No such program
Other community anti-poaching	N/A	N/A	N/A	No such program

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

Local government activities	$428.25	$75	-	
Water infrastructure improvements	$2142	-	-	
Sports teams funded	-	-	-	
Construction materials donated	-	-	-	$1275
Other: cash donation	$15,000	$15,000	$15,000	
Other: Farming supplys	-	-	$88.99	
TOTALS	$20,027.25	$15,247.81	$15,412	

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 0 2016: 0 2017: 0	2015: 1 2016: 0 2017:1	2015:3 2016:1 2017:3	2015: 5 2016: 1 2017:3
Percentage of U.S. clients	2015: 0 2016: 0 2017: 0	2015: 50% 2016:0% 2017:33%	2015:50% 2016:50% 2017:100%	2015:55% 2016:33% 2017:50%
Trophy fees paid by U.S. clients	2015: 0 2016: 0 2017: 0	2015:$18,320 2016:$0 2017:$15,050	2015:$46,890 2016:$16,050 2017:$44,630	2015:$82,060 2016:$16,050 2017:$7,900

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: _____$67,580/75%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc. Company lion hunting policy attached, Lion monitoring maps attached, 2017 anti poaching/community development and block enhancement report attached

14. I declare that the foregoing is true and correct.

    Signature: _____ Michael Angelides _____

    Name: Michael Angelides____ Title: ___Managing Director_____

Butzler, Julia <julia_butzler@fws.gov>

lions

Mike Angelides (b) (6) Wed, May 29, 2019 at 12:41 PM
To: Julia Butzler <julia_butzler@fws.gov>

Dear Julia,

Please find my written report which I send out to clients and my detailed summery of expenses.

It's only been recent that we have really had to show in detail what we do so I am still working on keeping better records, there still is a lot that we do that slips though the cracks.

This year with our successful lion permit (hopefully 2 the second will be huge because he will only book if he gets it), I want to particularly show how that a big 21 day lion safari brings in more income than a non lion hunt, successful or not, and because of that hunt we will have more income thus more to spend on community and anti poaching. So we are already looking at an increase of what we sent last year.

Please note that all the money we spend is from income after TAX, we do not get a tax write off or deductible for any contribution made, even the contribution from Dallas safari club comes in as income and TAX is deducted.

Thanks once again.

All the best
Mike

4 attachments

201819 AP report 1.1.pdf
6577K

ATT00001
1K

2018 Area Development Anti-poaching summary 1.1.xls
222K

ATT00002
7K

Anti-poaching and Community Development Report
June 2018 - March 2019.

Introduction

McCallum Safaris Tanzania is the marketing name for both Safari Royal and Old Nyika safaris, both companies are owned by Mike and Helen Angelides. In this report the expenditures of both companies are combined. We operate in 4 contiguous concessions in the west of Tanzania, namely Piti West Game Reserve, Chunya Lukwati, Chunya Msami and Lukwati North Game reserve.

In this report you will find a summary of our funding, expenditure and brief description of our participation in anti-poaching, area development and community assistance.

Funding

Our conservation and community efforts were funded solely by profit margins generated by tourist hunters, in 2015 we formed McCallum Safaris Custodians Conservation Program to enable Conservation Force to add us to their list of conservation projects that they support enabling donors to make a tax deductible donation.

In August 2018 August the McCallum Safaris Custodians Conservation Program were proud to receive a grant from the Dallas Safari Club Foundation of $20,000.

Anti-poaching equipment and training

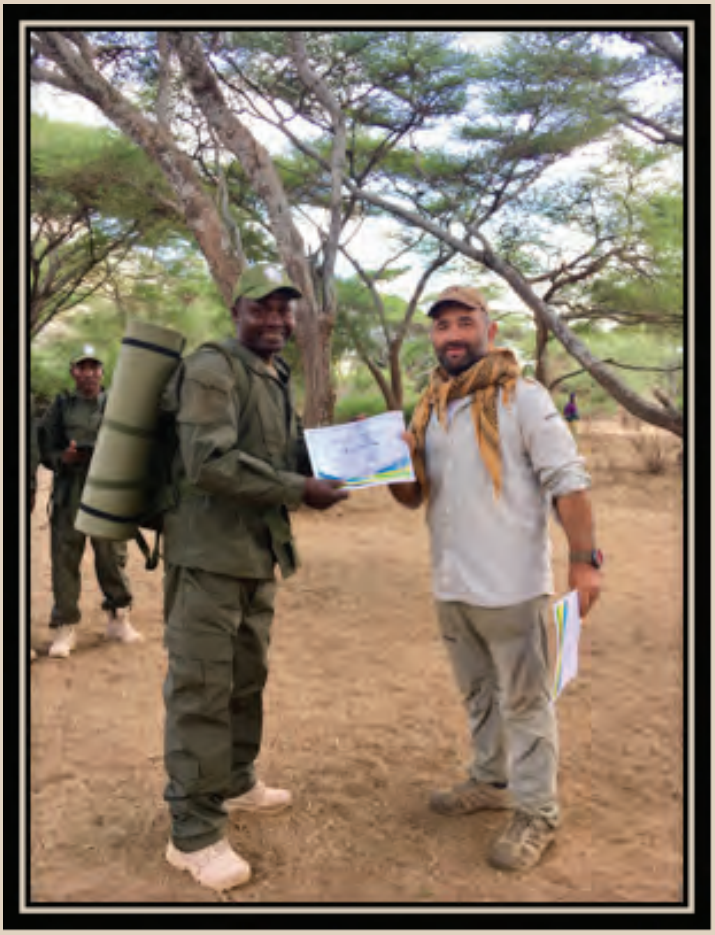
We have outfitted our Anti-poaching team leader with some new equipment and branded DSC clothing to instill pride and commitment to his work as well to assist him when on the ground. These items include;

Binoculars
Spotting scope
Camera
GPS

We have also purchased a Garmin spot trace (USD $99.99) and subscribed to a 1 Year Service Plan (USD $199.99). This will assist us to better monitor each patrols movements and have a better idea of how to plan and monitor our patrols.

We also have purchased the Spot Gen3 unit (USD - $149.99) and subscribed to a 1 Year Plan (USD -$199.99) which will enable the team leader to send an ok or distress message from anywhere on patrol. This plan will be activated when the team leader goes out on Patrol this month.

Anti poaching Training



At the end of 2018 The Spanish Wildlife Authority sponsored a new project called “The Euro Scout”. We sent two members of our anti-poaching crew to participate in the 10-day training course. Several new skills were learned including first aid, tracking and anti tracking technics, navigation, and data/evidence collection. The cost of this training was minimal to us; we hope that the Spanish Wildlife Authority will return again in 2019. We have offered to host the training in our western blocks.

Village contributions

It is mandatory to make cash contribution as Community Fees to the villages within or surrounding your hunting blocks. The amount is USD $5000 per hunting block and the District decides and advices which villages should receive this contribution. Up until 2017 we were only contributing to 2 Villages but in 2018 the district requested that we disperse the contribution to a total of 7 villages and the money is divided according to how much village land falls within or close to any particular hunting block. Our concern with this new structure is that our mandatory contribution and any additional budget allocated to direct contributions will remain the similar, therefore the villages will not get a substantial enough amount that will make a difference to them.

Villages that received cash contributions in 2018;

Gua – USD $5000
Ngwala – USD $5833
Kambikatoto – USD $5833
Mafyeko – USD $834
Mazimbo – USD $833
Mtanila – USD $833
Bitimanyanga – USD $834
Total fees community fees paid $20,000

Tangible contributions

Through dialog with our local villages, we determine what their priorities are, we also encourage them to do start a project that is achievable; we also ensure that they commit to partake in each project so as to appreciate the importance of working together. Our goal is to make villages realize that they need to work towards self-sufficiency but also understand that we are not able to commit and cover the full cost for a project and that they need to undertake projects that are realistically achievable. We expect to help the villages with a further donation of building materials for ongoing projects in 2019, inclusive of iron roofing sheets.

1. Ngwala Village local administration building.

In 2018 we delivered:
80x12 mm Iron rods for supporting walls. Cost USD $1005.29
40 x 50kg bags of cement (4480 Lbs.). Cost USD $264.55

2. Gua Village secondary school

This is an on going project that was started in 2017. As agreed, In July 2018 the village was able to fire harden enough clay bricks to commence the project, we assisted with by providing our tractor, Crew and trailer to deliver these bricks to the site, as well as transport foundation stones and sand to the building site.

We also fulfilled our commitment to supply all the roofing iron sheets for the classrooms once the building was elevated.

- Cost of delivery of fire hardened bricks and foundations rocks to the building site: USD $913
- 80 iron roofing sheets. USD $676.81

3. Gua Village - Transport of building supplies to local clinic.

We also assisted with our tractor and trailer to deliver bricks, foundation stones and sand to the building site of another building project in Gua village – a Local clinic.
The cost Delivery of fire hardened bricks and foundations rocks to the building site:
USD $611

Contributions to anti-poaching scouts and local game post

We have presently made a contribution to build the Toilet & washroom facilities at the new Ranger Game Post erected in the Lukwati / Piti Game reserve. Our contribution totaled Tshs 10,000,000/- (USD $4409.18). Building will commence in June 2019 and we have also committed to providing our tractor and crew to for use to assist with transporting bricks and rocks to the building site.

We also donated:
20 “police issue” batons to the local scouts: Cost USD $209
2 X 4 man “bow tents”: USD $1,058.20

Block development contributions

In 2017 we had begun assisting the local game department authorities to demarcate the Piti Game Reserve boundary. This is done by clearing the boundary area of trees and placing cement beacons at regular intervals. In 2018 we once again supplied our tractor, crew and trailer and with our help the authorities have completed the Southern and Eastern boundary cost: USD $913.58

We continue to open up and maintain a decent road network through out all the 4 areas allocated to our companies. This is of course important for hunting activities but is also crucial for our anti-poaching patrols. This rainy season we saw the need for an all weather circuit around the blocks. Patrolling during the rainy season, (which is also the closed season), is quite simply too hard on the vehicles and maintenance costs sky rocketed and the vehicles wear and tear was too extreme life. We are going to look into purchasing a
specialized possibly tracked vehicle for patrolling during the rains.

Poaching observations

Fishing and fishing camps

Fishing and fishing camps remain a problem on the Rungwa River. Licenses are issued for the area on the other side of the river, so the fishermen are mostly legal but numbers are not monitored. The project manager for our area has taken his complaint to the respective District commissioner citing section 74 of the Wildlife ACT . “Any human activity, settlement or any other development that will adversely affect wildlife shall not be permitted within five hundred meters from the wildlife protected area borderline without the permission of the Director”.

We have agreed to supply 2 tents this year to create a semi permanent game post on the river.

Poaching.

There is little if any activity of meat poaching during the hunting season (July-October). Our main concern during this time frame is wood cutters and honey gatherers who come in on foot across the Piti river boundary on day trips. The block adjacent to us across the Piti has been vacant since 2014 and the human encroachment has been immense and is devastating that particular area and now putting pressure on our area. The destruction caused by honey hunters is of particular concern, as they will cut down a whole tree for a little bit of honey.

In 2018 we only recorded two elephant carcasses, the first was a young female. The probability was that it was wounded and lost by a poacher, the Ivory was recovered, the second was a bull and the ivory had been hacked out.

During the rains (closed season) is when we see the most activity, but as mentioned previously in this report it is very difficult to traverse the area at this time. Between December 2018 and March 2019 team was able to capture 5 poachers and destroy several camps.

Income/expense Summery

Income

- Dallas Safari Club Foundation Grant $20,000
- Private Donations $1000

Expense Summery

DEVELOPMENT OF HUNTING AREAS:

SN	PARTICULARS	TSHS.	US$
1	Labour expenses for road building	T Sh13,499,955.00	$5,952.36
2	Vehicle expenses for road building	T Sh23,542,381.74	$10,380.24
3	Maintenance fees Piti airstrip	T Sh5,395,578.94	$2,379.00
4	Maintenance & licence fees Ipenyero airstrip	T Sh2,697,789.47	$1,189.50
4	3 disk plough	T Sh3,600,000.00	$1,587.30
	TOTAL	**T Sh48,735,705.15**	**$21,488.41**

CONTRIBUTIONS TO LOCAL COMMUNITIES:

SN	PARTICULARS	TSHS.	US$
	Community Fees paid to Gua	T Sh11,340,000.00	$5,000.00
1	Community Fees paid to Ngwala	T Sh13,229,244.00	$5,833.00
2	Community Fees paid to Kambikatoto	T Sh13,229,244.00	$5,833.00
3	Community Fees paid to Mafyeko	T Sh1,891,512.00	$834.00
4	Community Fees paid to Mazimbo	T Sh1,889,244.00	$833.00
5	Community Fees paid to Mtanila	T Sh1,889,244.00	$833.00
6	Community Fees paid to Bitimanyanga	T Sh1,891,512.00	$834.00
	TOTAL	**T Sh45,360,000.00**	**$20,000.00**

MISCELLANEOUS CONTRIBUTIONS TO VILLAGES

SN	PARTICULARS	TSHS.	US$
1	Contribution of 80 12mm iron rods for village administration buildling, Ngwala	T Sh2,280,000.00	$1,005.29
2	Contribution towards labour costs to prepare timber for building school desks	T Sh1,164,000.00	$513.23
3	Contribution of 40 bags of cement for administration building construction	T Sh600,000.00	$264.55
4	Contribution of 80 iron roofing sheets for secondary school classrooms	T Sh1,535,000.00	$676.81
5	Contribution of Tractor & Driver for transporting rocks & bricks for building		

secondary school T Sh2,072,000.00 $913.58
6 Contribution of tractor & Driver for transporting rocks & bricks for building dispensary T Sh1,386,000.00 $611.11

TOTAL T Sh9,037,000.00 $3,984.57

SUPPORT TO ANTI-POACHING OPERATIONS:

SN	PARTICULARS	TSHS.	US$
1	Anti-poaching wages & rations	T Sh36,275,732.00	$15,994.59
2	Vehicle expenses for anti-poaching patrols	T Sh11,260,192.26	$4,964.81
3	Donation of 2 Bow tent2	T Sh2,400,000.00	$1,058.20
4	Donation of antipoaching batons	T Sh474,012.00	$209.00
5	Contribution of tractor & driver for Piti boundary posts	T Sh2,072,000.00	$913.58
6	Rewards paid	T Sh400,000.00	$176.37
5	Donation of cash for building of washrooms at new game post	T Sh10,000,000.00	$4,409.17
6	Donation of antipoaching batons	T Sh1,360,800.00	$600.00
7	Spot trace device and subscription	T Sh678,109.32	$298.99
8	Spot Gen 3	T Sh340,177.32	$149.99

TOTAL T Sh65,261,022.90 $28,774.70

Total Area Development, Community & Antipoaching
T Sh168,393,728.05 $74,247.68

How to Contribute

We would really appreciate any support of contribution. We are proud to work with and have the support of Conservation Force who provide us with a tax-deductible channel for any contribution.

- Conservation Force is a 501(c) (3) non-profit organization and all donations are tax deductible. We are in great need of your support, if you would like to donate to the Custodians Conservation Project please send donations to Conservation Force:

- Postal Contributions: Conservation Force P.O Box 278 Metairie, LA 70004-0278
- Internet Contributions: www.conservationforce.org/donate

- Ref: Custodians Conservation Program

For the future

We are currently at our limit of what we are financially able to contribute and have already had to make the difficult decision to cut tangible community contributions so we hope to continue our partnership with DSC and DSCF who have enable us to almost double our anti-poaching efforts in the last 9 months. We also hope to and keep better records and reports to hopefully gain more contributions to grow our program to a level where it can expand to the vacant areas that currently border us.

We will work on preparing a rainy season road circuit and research how and with what vehicle we can effectively patrol during the rains. Maintaining a presence is a huge deterrent and has been very effective so far.

This dry season of particular concern is our river boundary, we have committed to supplying at least 2 tents to set up a semi permanent game post close to the river.

Now that we have 7 villages to work with we would like to employ a community officer do keep in contact with each of them, with this our current team leader Rodrick will concentrate exclusively on anti-poaching activities.

As mentioned it is going to be difficult to spread a decent amount of money across 7 villages, we already anticipate that past villages will still expect past levels of tangible contributions. No doubt Gua will want more funding to compete their secondary school and Ngwala will want continued help with the completion of their administration building.

Yours in conservation.

Mike Angelides
McCallum Safaris, Tanzania
Custodians Conservation Program

Gua Secondary school nearing compleation

2018 CREW EXPENSES

WAGES 2018		at %10	5%	1%		
Category	Daily	NSSF	SDL	WCF	Total	
Team Leader	52,170.00	5,217	2,609	522	1,565,100.00	
Driver	12,500	1,250	625	125	14,500.00	2018
Tracker	12,500	1,250	625	125	14,500.00	2018
Turn boy	10,800	1,080	540	108	12,528.00	2018
Casual	6,000	-	-	-	6,000.00	2018

RATIONS						
ITEM	UNIT	PPM	COST		TOTAL COST	
Sembe	2kg	8	1,000		8,000.00	2018
Beans - Red	1kg	5	1,900		9,500.00	2018
Rice	1kg	8	2,200		17,600.00	2018
Sugar	1kg	3	3,000		9,000.00	2018
Tea	250g	1	3,000		3,000.00	2018
Milk powder	500g	1	11,400		11,400.00	2018
Salt	250gms	1	450		450.00	2018
Cooking Oil	1lts	1	3,500		3,500.00	2018
Laundry Soap	1 bar	1	2,000		2,000.00	2018
Bath Soap	pcs	2	550		1,100.00	2018
Torch batteries	pcs	4	820		3,280.00	2018
Carrots	kg	3	2,000		6,000.00	
Onion	kg	2	3,000		6,000.00	2018
Tomato paste	kg	5	360		1,800.00	2018
Potatoes	KG	3.00	1,000		3,000.00	2018
TOTAL COST PER CREW PER ONE MONTH					85,630.00	
TOTAL COST PER CREW PER DAY					2,854.33	

Government Game Scout per day	
Wage	55,000
Bedding	427
Rations	2,854
GGS Cook/assistant	10,800
Accommodation	3,000

Avg 150 working days

Avg 300 working days

UNIFORMS & BEDDING 2018		
ITEM	Driver	Tracker
Overall	55,000	55,000
Shirt/Trousers	74,400	74,400
Checked shirt	-	-
Khaki trousers	-	-
Mess jacket	-	-
Mess trousers	-	-
T-shirt	6,500	6,500
Jersey	-	-
Cooks trousers	-	-
Fleece	-	-
Cooks shirt	-	-
Cooks apron	-	-
Cooks hat	-	-
Tracker coat	20,000	20,000
Rubber shoes	15,000	15,000
Leather boots	55,000	55,000
Safari boots	-	-
	225,900	225,900
TOTAL	1,506	1,506
Mattress	50,000	50,000
Blanket	20,000	20,000
Net	8,000	8,000
Valise	30,000	30,000
Mug	1,200	1,200
Plate	1,000	1,000
Sufuria	9,000	9,000
Kettle	9,000	9,000
TOTAL	128,200	128,200
	427	427

Total	72,082

TOTAL COST FOR CAMP CREW - Based on 150 working days per season

Category	WAGE	RATIONS	UNIFORM	MEDICAL	TRAVEL	ACCOMM	TOTAL
Driver	14,500	2,854	1,933	150.00	1,500	1500	22,438
Tracker	14,500	2,854	1,933	150.00	1,500	1500	22,438
Turn boy	12,528	2,854	1,185	150.00	1,500	1500	19,718
Casual	6,000	2,854	937	150.00	1,500	1500	12,942
Total cost per day	**47,528**	**11,417**	**5,989**	**600.00**	**6,000**	**6,000**	**77,535**

Turn boy	Casual		
55,000	55,000	2018	
37,200	-	2018	
-	-		
-	-		
-	-		
-	-		
6,500	6,500	2018	
-	-		
-	-		
-	-		
-	-		
-	-		
-	-		
		2018	
15,000	15,000	2018	
-	-	2018	
-	-		
113,700	76,500		642,000
758	510		
50,000	50,000	2018	
20,000	20,000	2018	
8,000	8,000	2018	
30,000	30,000	2018	
1,200	1,200	2018	
1,000	1,000	2018	
9,000	9,000	2018	
9,000	9,000	2018	
128,200	128,200		
427	427.33		

VEHICLE COSTS 2018

Land Cruisers (hunting) 2018						
Registration	Liters	Fuel	Spares	Maintenance	Tools	Tyres
T 669 AYA	1,723.00	3,618,300.00	536,613.56	114,406.78	-	2,460,451.98
T 740 BAA	1,811.00	3,803,100.00	5,017,680.51	117,118.64	-	1,392,655.50
T 877 BCS	2,195.00	4,609,500.00	1,273,063.56	144,914.36	-	1,392,655.38
T 922 BCS	2,004.00	4,208,400.00	3,713,163.56	6,931,618.64	-	-
TOTAL COSTS	7,733.00	16,239,300.00	10,540,521.19	7,308,058.42	-	5,245,762.86
Average cost	1,933.25	4,059,825.00	2,635,130.30	1,827,014.61	-	1,311,440.72

Anti-poaching Land Cruiser 2018						
Registration	Liters	Fuel	Spares	Maintenance	Tools	Tyres
T 363 ABZ	1,656.00	3,643,200.00	2,173,022.88	916,233.90	-	Tyres are handed down from hunting vehicles
T 549 ACA	1361.00	2,994,200.00	1,176,317.80	465,254.24	-	Tyres are handed down from hunting vehicles
TOTAL COSTS	3,017.00	6,637,400.00	3,349,340.68	1,381,488.14	-	-
Average cost	1,508.50	3,318,700.00	1,674,670.34	690,744.07	-	-

Town, standby vehicles and trailers			Spares	Maintenance	Tools	Tyres
T 586 AXC		-				
T 589 AXJ		-	292,683.90	55,932.20		
T 590 BLS		-				
T 340 ACA		-				
T 960 ACA		-				
T 326 ACA		-				
T 600 APF						
TOTAL COSTS	-	-	292,683.90	55,932.20	-	-
Average cost	-	-	73,170.98	13,983.05	-	-

Tractors						
Registration	Liters	Fuel	Spares	Maintenance	Tools	Tyres
T 340 AQB	1,878.00	4,131,600.00	5,057,355.00	61,017.00		750,000.00
T 444 ACA	Under repairs					
T 332 BFN	1,459.00	3,209,800.00		288,559.32		398,305.08
TOTAL COSTS	3,337.00	7,341,400.00	5,057,355.00	349,576.32	-	1,148,305.08
Average cost	834.25	1,835,350.00	1,264,338.75	87,394.08	-	287,076.27

DAF (4 ton truck)						
Registration	Liters	Fuel	Spares	Maintenance	Tools	Tyres
T 372 ACA	Under repairs					1,398,305.08
T 376 ACA	1,757.00	3,865,400.00		49,500.00		1,398,305.08
T 471 AEV	2,222.00	4,888,400.00				82,627.12
T 296 ACA	2,862.00	6,296,400.00				82,627.12

TOTAL COSTS	6,841.00	15,050,200.00	-	49,500.00	-	2,961,864.40
Average cost	1,710.25	3,762,550.00	-	12,375.00	-	740,466.10

Total Liters	20,928.00

Insurance	Licences	Depreciation	TOTAL	Anti-poaching days	Road building
1,792,972.50	140,796.00	1,100,692.00	9,765,955.82	15	0
1,792,972.50	140,796.00	1,100,692.00	13,366,826.15	3	28
1,394,534.17	140,796.00	1,985,715.00	10,943,373.47	5	0
1,394,534.17	140,796.00	1,985,715.00	18,376,231.37	3	0
6,375,013.33	563,184.00	6,172,814.00	52,452,386.80		
1,593,753.33	140,796.00	1,543,203.50	13,113,096.70		

Insurance	Licences	Depreciation	TOTAL	Anti-poaching days	Road building
66,091.67	140,796.00	1,985,715.00	8,926,715.45	38	16
84,975.00	140,796.00	1,100,692.00	5,962,235.04	68	19
151,066.67	281,592.00	3,086,407.00	14,888,950.49		
75,533.33	140,796.00	1,543,203.50	7,444,475.24		

Insurance	Licences	Depreciation		
509,850.00	145,796.00	1,100,692.00	1,756,338.00	
396,550.00	50,000.00	1,985,715.00	2,780,881.10	
1,394,534.17	145,796.00	1,242,000.00	2,782,330.17	
84,975.00	140,796.00	1,100,692.00	1,326,463.00	
42,487.50	432,500.00	1,100,692.00	1,575,679.50	
66,091.67		1,242,000.00	1,308,091.67	
	55,000.00	1,985,715.00	2,040,715.00	
2,494,488.33	969,888.00	9,757,506.00	13,570,498.43	
623,622.08	242,472.00	2,439,376.50	3,392,624.61	-

Insurance	Licences	Depreciation	TOTAL	Anti-poaching days	Road building
66,091.67	N/A	1,100,692.00	11,168,633.67		68
66,091.67	N/A	1,985,715.00	2,051,806.67		
84,975.00	N/A	1,100,692.00	5,082,331.40		73
217,158.33	-	4,187,099.00	18,300,893.73		
54,289.58	-	1,046,774.75	4,575,223.43		

Insurance	Licences	Depreciation	TOTAL	
	70,000.00	1,100,692.00	2,568,997.08	
203,940.00	70,000.00	1,100,692.00	6,689,594.08	
158,620.00	70,000.00	1,985,715.00	7,187,584.12	
158,620.00	70,000.00	1,242,000.00	7,852,509.12	

521,180.00	280,000.00	5,429,099.00	24,291,843.40	
130,295.00	70,000.00	1,357,274.75	6,072,960.85	

Airstrip
4
5
5
2

Airstrip
2
0

Airstrip	
0	
8	

2018 VEHICLE EXPENSES, Averages

	HUNTING LAND CRUISER	ANTI-POACHING LAND CRUISER	DAF TRUCK	TRACTOR
LICENSE & PERMIT	140,796	140,796	70,000	-
INSURANCE	1,593,753	75,533	130,295	54,290
SPARES & MAINTENANCE	5,773,586	2,365,414	752,841	1,638,809
INFLATION	577,359	236,541	75,284	163,881
FUEL	4,059,825	3,318,700	3,762,550	1,835,350
DEPRECIATION	1,543,204	1,543,204	1,357,275	1,357,275
TOTAL COST PER YEAR	13,688,522	7,680,189	6,148,245	5,049,604
Average kms/year	8149	5732	1710	331

Cost per km	1,680	1,340	3,595	15,256
Vehicle cost per hunting day	285,548	100,486	305,570	91,534
Driver	22,438	22,438	42,155	35,379
Costs per day	TZS 309,665	TZS 124,263	TZS 351,320.114	TZS 142,168.549
Cost per day in USD	$ 137	$ 55	$ 155	$ 63

W&T Average costs

Vehicle	Cost w/o fuel	Cost per km	kms/day	Daily W&T	
Hunting car	9,628,697	1,181.52	170	TZS 200,858	$89
ANTI- POACHING LAND CRUISER	4,361,489	760.86	75	TZS 57,065	$25
DAF TRUCK	2,385,695	1,394.94	85	TZS 118,570	$52
Tractor	3,214,254	9,710.74	6	TZS 58,264	$26

USD $Rate (2018)	**2268**

2018

ROAD BUILDING COSTS 2018

Vehicle Registration:		T 740 BAA		LANDCRUISER								
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
June	9	200,858	1,807,723	192	3.8	51	2,100	106,105	6	106,138	955,242	2,869,071
August	19	200,858	3,816,305	384	3.8	101	2,100	212,211	6	106,138	2,016,622	6,045,138
TOTAL	28		5,624,028	576		152		318,316			2,971,864	8,914,208

Vehicle Registration:		T 363 ABZ		Dedicated AP Land Cruiser								
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
June	10	57,065	570,646.43	210	3.8	55	2,100	116,053	6	106,138	1,061,380	1,748,079
July	6	57,065	342,388	120	3.8	32	2,100	66,316	6	106,138	636,828	1,045,532
TOTAL	16		913,034	330		87		182,368			1,698,208	2,793,611

Vehicle Registration:		T 549 ACA		Dedicated AP Land Cruiser								
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
June	12	57,065	684,775.71	256	3.8	67	2,100	141,473.68	6	106,138	1,273,656	2,099,905
July	5	57,065	285,323	98	3.8	26	2,100	54,158	6	106,138	530,690	870,171
August	2	57,065	114,129	42	3.8	11	2,100	23,211	6	106,138	212,276	349,616
TOTAL	19		1,084,228	396		104		218,842			2,016,622	3,319,692

Vehicle registration:		T 332 BFN		TRACTOR								
Month	Days	W&T / day	Total W&T	Hrs	lt/hr	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
June	25	58,264	1,456,611	99	4.60	455	2,100	956,340	3	48,321	1,208,025	3,620,976
July	27	58,264	1,573,140	130	4.60	598	2,100	1,255,800	3	48,321	1,304,667	4,133,607
August	21	58,264	1,223,553	85	4.60	391	2,100	821,100	3	48,321	1,014,741	3,059,394
TOTAL	73		4,253,303	314		1,444		3,033,240			3,527,433	10,813,976

Vehicle registration:		T 340 AQB		TRACTOR								
Month	Days	W&T / day	Total W&T	Hrs	lt/hr	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
June	13	58,264	757,438	82	5.20	426	2,100	895,440	3	48,321	628,173	2,281,051
July	25	58,264	1,456,611	154	5.20	801	2,100	1,681,680	3	48,321	1,208,025	4,346,316
August	30	58,264	1,747,933	126	5.20	655	2,100	1,375,920	3	48,321	1,449,630	4,573,483
TOTAL	68		3,961,981	362		1,882		3,953,040			3,285,828	11,200,849

ROAD BUILDING COSTS 2018

Summary of Road Building Costs 2018

Crew:			
L/Cruiser	No.	Cost/day	Total
Driver	1	22,438	22,438
Crew	2	22,438	44,875
Casual	3	12,942	38,825
TOTAL	**6**		106,138

Tractor	No.	Cost/day	Total
Driver	1	22,438	22,438
Casual	2	12,942	25,883
TOTAL	**3**		48,321

DAF	No.	Cost/day	Total
Driver	1	22,438	22,438
Turnboy	1	19,718	19,718
TOTAL	**2**		42,155

TOTAL COST FOR CAMP CREW - Based on 150 working days per season							
Category	WAGE	RATIONS	UNIFORM	MEDICAL	TRAVEL	ACCOMM	TOTAL
Driver	14,500	2,854	1,933	150	1,500	1500	22,438
Tracker	14,500	2,854	1,933	150	1,500	1500	22,438
Turnboy	12,528	2,854	1,185	150	1,200	1500	19,418
Casual	6,000	2,854	937	150	500	1500	11,942

Summary

Days	204
Total km	1978
Hours	676
Fuel used	3669
Fuel cost	7,705,806
Crew costs	13,499,955
W&T	15,836,575
Total costs	TZS 37,042,337

Rate Used	
1$	$2,268

$16,333

$1,006

$1,916

$2,017

ANTI-POACHING COSTS 2018

Vehicle Registration:	T363ABZ	Dedicated AP Land Cruiser		LANDCRUISER							
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost
June	14	57,065	798,905	756	3.80	199	2,100	417,789.47	5	132,534	1,855,481
July	10	57,065	570,646	630	3.80	166	2,100	348,158	5	132,534	1,325,343
August	8	57,065	456,517	368	3.80	97	2,100	203,368	5	132,534	1,060,275
September	5	57,065	285,323	260	3.80	68	2,100	143,684	5	132,534	662,672
October	1	57,065	57,065	57	3.80	15	2,100	31,500	5	132,534	132,534
November		57,065	-		3.80	0	2,100	-	5	132,534	-
TOTAL	38		2,168,456	2071		545		1,144,500			5,036,305

Vehicle registration:	T549ACA	Dedicated AP Land Cruiser		LANDCRUISER							
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost
June		57,065	-		3.80	0	2,100	-	5	132,534	-
July	2	57,065	114,129	176.68	3.80	46	2,100	97,641	5	132,534	265,069
August	10	57,065	570,646	312	3.80	82	2,100	172,421	5	132,534	1,325,343
September	2	57,065	114,129	53	3.80	14	2,100	29,289	5	132,534	265,069
October	12	57,065	684,776	852	3.80	224	2,100	470,842	5	132,534	1,590,412
November		57,065	-	0	3.80	0	2,100	-	5	132,534	-
December	14	57,065	798,905	672	3.80	177	2,100	371,368	5	132,534	1,855,481
January 2019	14	57,065	798,905	728	3.80	192	2,100	402,316	5	132,534	1,855,481
February 2019	14	57,065	798,905	578	3.80	152	2,100	319,421	5	132,534	1,855,481
TOTAL	68		3,880,396	3372		887		1,863,299			9,012,335

1978

Vehicle registration:	T 922 BCS			LANDCRUISER							
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost
August	3	57,065	171,194	146	4.22	35	2,100	72,733	5	132,534	397,603
TOTAL	3		171,194	146		35		72,733			397,603

Vehicle Registration:	T 740 BAA			LANDCRUISER							
Date	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost

ANTI-POACHING COSTS 2018

June		57,065	-		4.22	0	2,100	-	5	132,534	-
July		57,065	-		4.22	0	2,100	-	5	132,534	-
August					4.22				5	132,534	-
September	3	57,065	171,194	168	4.22	40	2,100	83,693	5	132,534	397,603
TOTAL	3		171,194	168		40		83,693			397,603

Vehicle Registration:	**T 669 AYA**			**LANDCRUISER**							
Date	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost
July		57,065	-		4.22	0	2,100	-	5	132,534	-
August	1	57,065	57,065	72	4.22	17	2,100	35,868	5	132,534	132,534
September	12	57,065	684,776	540	4.22	128	2,100	269,014	5	132,534	1,590,412
October	2	57,065	114,129	120	4.22	28	2,100	59,781	5	132,534	265,069
TOTAL	15		855,970	732		174		364,663			1,988,015

Vehicle Registration:	**T 877 BCS**			**LANDCRUISER**							
Date	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost
July		-	-		4.22	0	2,100	-	5	132,534	-
August	1	57,065	57,065	88	4.22	21	2,100	43,839	5	132,534	132,534
September	2	57,065	114,129	176	4.22	42	2,100	87,678	5	132,534	265,069
October	2	57,065	114,129	135	4.22	32	2,100	67,253	5	132,534	265,069
TOTAL	5		285,323	399		95		198,771			662,672

Vehicle registration:		**Truck**		**DAF**							
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost
June		118,570	-		2.90	0	2,100	-	2	41,555	-
TOTAL	0		-	0							-

Crew:

L/Cruiser	No.	Cost/day	Total
Team Leader	1	6,267	6,267
Driver	1	22,138	22,138
Gov Game scout (GGS)	1	59,854	59,854
Tracker	2	22,138	44,275
TOTAL	5		132,534

TOTAL COST FOR CAMP CREW - Based on 150 working days per season

Category	WAGE	RATIONS	UNIFORM	MEDICAL	TRAVEL	ACCOMM
Driver	14,500	2,854	1,933	150	1,200	1500
Tracker	14,500	2,854	1,933	150	1,200	1500
Turnboy	12,528	2,854	1,185	150	1,200	1500
Casual	6,000	2,854	937	150	500	1500
T/Leader		3,067	-	-	1,200	2000

ANTI-POACHING COSTS 2018

DAF	No.	Cost/day	Total
Driver	1	22,138	22,138
Turnboy	1	19,418	19,418
TOTAL	**2**		41,555

Tractor	No.	Cost/day	Total
Driver	1	22,138	22,138
Casual	2	11,942	23,883
TOTAL	**3**		46,021

GGS	55,000	2,854		-	-	2000

Summary

Days		132
Total km		6888
Total hrs		
Fuel used		1,775
Team leader		18,781,200 yearly salary
Fuel cost		3,727,659
Crew costs		17,494,532
W&T		7,532,533
Total costs	TZS	47,535,924
	$	20,959

Rate	**$1**	**$**	**2,268**

TOTAL COST
3,072,175
2,244,148
1,720,160
1,091,679
221,099
-
8,349,261

TOTAL COST	closed season cost
-	
476,839	
2,068,411	
408,487	
2,746,030	
-	
3,025,754	
3,056,701	
2,973,807	9,056,262
	3,993.06
14,756,030	

TOTAL COST
641,530
641,530

TOTAL COST

-
-
-
652,490
652,490

TOTAL COST
-
225,467
2,544,201
438,979
3,208,647

TOTAL COST
-
233,438
466,876
446,451
1,146,766

TOTAL COST
-
-

TOTAL
22,138
22,138
19,418
11,942
6,267

59,854

AIR STRIP COSTS 2018

Includes building and maintenance throughout the season

Vehicle registration:	T922BCS	Land cruiser		LAND CRUISER							
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
August	1	200,858	200,858	127	3.80	33	2,100	70,184	6	106,138	106,138	377,180
September	0	200,858	-	0	3.80	0	2,100	-	6	106,138	-	-
October	1	200,858	200,858	118	3.80	31	2,100	65,211	6	106,138	106,138	372,207
TOTAL	2		401,716	245		64		135,395			212,276	749,387

Vehicle registration:	T 877BCS	Land cruiser		LAND CRUISER							
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
August	1	200,858	200,858	132	4.40	30	2,100	63,000	6	106,138	106,138	369,996
September	3	200,858	602,574	157	4.40	36	2,100	74,932	6	106,138	318,414	995,920
October	1	200,858	200,858	112	4.40	25	2,100	53,455	6	106,138	106,138	360,451
TOTAL	5		1,004,291	401		91		191,386			530,690	1,726,367

Vehicle registration:	T 669 AYA	Land cruiser		LAND CRUISER							
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
July	2	200,858	401,716	214	4.90	44	2,100	91,714	6	106,138	212,276	705,707
August	1	200,858	200,858	108	4.90	22	2,100	46,286	6	106,138	106,138	353,282
September	1	200,858	200,858	124	4.90	25	2,100	53,143	6	106,138	106,138	360,139
TOTAL	4		803,433	446		91		191,143			424,552	1,419,127

Vehicle registration:	T 740 BAA	Land cruiser		LAND CRUISER							
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
July	1	200,858	200,858	126	3.80	33	2,100	69,632	6	106,138	106,138	376,628
August	3	200,858	602,574.47	145	3.80	38	2,100	80,132	6	106,138	318,414	1,001,120
September	1	200,858	200,858	132	3.80	35	2,100	72,947	6	106,138	106,138	379,944
TOTAL	5		1,004,291	403		106		222,711			530,690	1,757,691

Vehicle registration:	T 549 ACA	Dedicated AP Land Cruiser		LAND CRUISER							
Month	Days	W&T /day	Total W&T	km	km/lt	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST
June	2	57,065	114,129	199	3.80	52	2,100	109,973.68	6	106,138	212,276	436,379
TOTAL	2		114,129	199		52		109,974			212,276	436,379

Vehicle registration:	T 332BFN	Tractor		Tractor							
Month	Days	W&T /day	Total W&T	hrs	km/hr	Fuel	cost/lt	Total fuel cost	Crew	Crew costs/day	Total crew cost	TOTAL COST

AIR STRIP COSTS 2018

June	8	58,264	466,115	58	4.90	283	2,100	593,733	3	48,321	386,568	1,446,416
TOTAL	8		466,115	58		283		593,733			386,568	1,446,416

	Summary	Total costs	Piti	Msami	Ipenyero
1	Vehicle Costs	5,238,316	3,492,210.94		1,746,105.47
2	Labour Costs	2,297,052	1,531,368.00		765,684.00
3	Lime & cement	558,000.00	372,000.00		186,000.00
5	TCAA registration fees	-	-	-	-
		TZS 8,093,368	TZS 5,395,579	TZS -	TZS 2,697,789
		$ 3,569	$ 2,379	$ -	$ 1,190

Rate:	**2268**

Summary	
Days	26
Total km	1694
Hours	58
Fuel used	688
Fuel cost	1,444,341
Crew costs	2,297,052
W&T	3,793,975
Total costs	7,535,368

VEHICLE FUEL & MILEAGE SUMMARY - 2(

DAF Truck

No.	Vehicle	Total Kms	Total Fuel	Av Kms/Lt	Hunting	Roads
1	T 471 AEV	6444	2222	2.9		
2	T 376 ACA	5095	1757	2.9		
3	T 372 ACA	0		2.9		
4	T 296 ACA	8300	2862	2.9		
		19839	6841	2.9		
	Average	**4960**	**1710**			

Land Cruiser (hunting)

No.	Vehicle	Total Kms	Total Fuel	Av Kms/Lt	Hunting	Roads
6	T 922 BCS	7615	2004	3.8		
7	T 877 BCS	9658	2195	4.4		
8	T 740 BAA	6882	1811	3.8		
9	T 669 AYA	8443	1723	4.9		
		32598	7733	4.2		
	Average	**8149**	**1933**			

Dedicated AP Land Cruiser

No.	Vehicle	Total Kms	Total Fuel	Av Kms/Lt	Hunting	Roads
10	T 363 ABZ	6293	1656	3.8		
11		0				
12	T 549 ACA	5172	1361	3.8		
13		0				
		11465	3017	3.8		0
	Average	**5732**	**1509**			

TOTAL	129447	35809		0	0

Tractors

No.	Vehicle	Total Hours	Total Fuel	Av Lts/Hr	Hunting	Roads
2	T 332 BFN	229	1459	4.6		
3	T 340 AQB	433	1878	5.2		
	Total	662	3337	4.9		0
	Average	**331**	**1669**			

total liters 20,928

)18 SEASON

A-P	Airstrips	Community	Other

odometer cables not working Av KMs worked out from historical data

A-P	Airstrips	Community	Other

A-P	Airstrips	Community	Other
0	0		

0	0	0	0
0			

A-P	Airstrips	Community	Other
	0		

SAFARI ROYAL/OLD NYIKA SAFARIS

GENERAL ASSESSMENT OF ANTIPOACHING AREA DEVELOPMENT AND COMMUNITY PARTICIAPTION PERFORMANCE
2018

DEVELOPMENT OF HUNTING AREAS:

SN	PARTICULARS	TSHS.		US$	
1	Labour expenses for road building	T Sh	13,499,955.00	$	5,952.36
2	Vehicle expenses for road building	T Sh	23,542,381.74	$	10,380.24
3	Maintenance fees Piti airstrip	T Sh	5,395,578.94	$	2,379.00
4	Maintenance & licence fees Ipenyero airstrip	T Sh	2,697,789.47	$	1,189.50
4	3 disk plough	T Sh	3,600,000.00	$	1,587.30
	TOTAL	**T Sh**	**48,735,705.15**	**$**	**21,488.41**

CONTRIBUTIONS TO LOCAL COMMUNITIES:

SN	PARTICULARS	TSHS.		US$	
	Community Fees paid to Gua	T Sh	11,340,000.00	$	5,000.00
1	Community Fees paid to Ngwala	T Sh	13,229,244.00	$	5,833.00
2	Community Fees paid to Kambikatoto	T Sh	13,229,244.00	$	5,833.00
3	Community Fees paid to Mafyeko	T Sh	1,891,512.00	$	834.00
4	Community Fees paid to Mazimbo	T Sh	1,889,244.00	$	833.00
5	Community Fees paid to Mtanila	T Sh	1,889,244.00	$	833.00
6	Community Fees paid to Bitimanyanga	T Sh	1,891,512.00	$	834.00
	TOTAL	**T Sh**	**45,360,000.00**	**$**	**20,000.00**

MISCELLANEOUS CONTRIBUTIONS TO VILLAGES

SN	PARTICULARS	TSHS.		US$	
1	Contribution of 80 12mm iron rods for village administration buildling, Ngwala	T Sh	2,280,000.00	$	1,005.29
2	Contribution towards labour costs to prepare timber for building school desks	T Sh	1,164,000.00	$	513.23
3	Contribution of 40 bags of cement for administration building construction	T Sh	600,000.00	$	264.55
4	Contribution of 80 iron roofing sheets for secondary school classrooms	T Sh	1,535,000.00	$	676.81
5	Contribution of Tractor & Driver for transporting rocks & bricks for building secondary school	T Sh	2,072,000.00	$	913.58
6	Contribution of tractor & Driver for transporting rocks & bricks for building dispensary	T Sh	1,386,000.00	$	611.11
	TOTAL	**T Sh**	**9,037,000.00**	**$**	**3,984.57**

SUPPORT TO ANTI-POACHING OPERATIONS:

SN	PARTICULARS	TSHS.		US$	
1	Anti-poaching wages & rations	T Sh	36,275,732.00	$	15,994.59
2	Vehicle expenses for anti-poaching patrols	T Sh	11,260,192.26	$	4,964.81
3	Donation of 2 Bow tent2	T Sh	2,400,000.00	$	1,058.20
4	Donation of antipoaching batons	T Sh	474,012.00	$	209.00

SAFARI ROYAL/OLD NYIKA SAFARIS

GENERAL ASSESSMENT OF ANTIPOACHING AREA DEVELOPMENT AND COMMUNITY PARTICIAPTION PERFORMANCE

2018

5	Contribution of tractor & driver for Piti boundary posts	T Sh	2,072,000.00	$	913.58
6	Rewards paid	T Sh	400,000.00	$	176.37
5	Donation of cash for building of washrooms at new game post	T Sh	10,000,000.00	$	4,409.17
6	Donation of antipoaching batons	T Sh	1,360,800.00	$	600.00
7	Spot trace device and subscription	T Sh	678,109.32	$	298.99
8	Spot Gen 3	T Sh	340,177.32	$	149.99
	TOTAL	**T Sh**	**65,261,022.90**	**$**	**28,774.70**

Total Area Development, Community & Antipoaching	**T Sh 168,393,728.05**	**$ 74,247.68**

Total expenditure summery

McCallum Safaris		**$ 53,247.68**

SAFARI ROYAL/OLD NYIKA SAFARIS

GENERAL ASSESSMENT OF ANTIPOACHING AREA DEVELOPMENT AND COMMUNITY PARTICIAPTION PERFORMANCE

2018

Dallas Safari Club Foundation Grant		**$ 20,000.00**
Private donations		**$ 1,000.00**
		$ 74,247.68

SAFARI ROYAL/OLD NYIKA SAFARIS

GENERAL ASSESSMENT IN HUNTING PERFORMANCE

2018

Please note that we are operating at less than 50% of our capability in all areas, this is due to many things, the lion import suspension probably the prime reason.

Utilization of less than 40% results in additional penalties issued by the

Appendix 'A'

BLOCK UTILIZATION

SN	PARTICULARS	Below 40%	Above 40%
1	Chunya Msami	N/A	48.5
2	Piti (West) Open Area	N/A	46.7
3	Chunya Lukwati	N/A	43.0
1	Lukwati Game Reserve (North)	N/A	49.70

PAYMENT OF GOVERNMENT FEES:

SN	PARTICULARS	TOTAL IN US$
1	Game Fees	$ 182,020.00
2	Conservation Fees	$ 67,050.00
3	Hunting Permits	$ 26,400.00
4	Trophy Handling Fees	$ 12,000.00
5	Inter company license	$ 8,700.00
6	Block Fees	$ 120,000.00
	TOTAL	**$ 416,170.00**

Grand Total of all contributions	**$ 490,417.68**

2018

Exchange rate used

2268

Please enter correct exchang

Diesel cost

2100

Please enter diesel cost if yo

Butzler, Julia <julia_butzler@fws.gov>

CITES appl / ref#04657D / addl info needed

3 messages

Butzler, Julia <julia_butzler@fws.gov> Tue, May 28, 2019 at 2:35 PM
To: Todd Cusick [redacted] >
Cc: "John J. Jackson, III" <jjj@conservationforce.org>, Mike Angelides [redacted]

Mr. Cusick,

I have begun the process of reviewing your permit application to import one lion taken from Tanzania in the 2019 season. Please address the following:

1/ we have on file an application submitted in January of 2017 for a lion hunted in 2017. Please verify that you would like to withdraw that application.

2/ Can you please provide the estimated date of the hunt?

3/ Can you please verify the location of the hunt?

Your application has been attached to this email.

Thank you,

--
Julia Butzler, Biologist
Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
(703) 358-1988

Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.

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11756K

Todd Cusick [redacted] Tue, May 28, 2019 at 2:46 PM
To: Julia Butzler <julia_butzler@fws.gov>
Cc: "John J. Jackson, III" <jjj@conservationforce.org>, Mike Angelides [redacted]

1) Yes, I withdraw the 2017 application.

2) October - November 2019

3) Lukwati Game Reserve, Chunya District Tanzania, Chunya Msami, Chunya Lukwati and Piti West Concessions

Thank you!

Todd Cusick

[Quoted text hidden]
[Quoted text hidden]
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MIke Angelides [redacted] Tue, May 28, 2019 at 2:54 PM
To: Todd Cusick <[redacted] >
Cc: Julia Butzler <julia_butzler@fws.gov>, "John J. Jackson, III" <jjj@conservationforce.org>

Dear Todd,

Yes, That is correct.

Best
Mike

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-04657D

Enhancement Finding
Applicant: Todd Dennis Cusick

I. Summary:

Mr. Cusick submitted an application on August 23, 2018, for the importation of one male African lion (*Panthera leo melanochaita*) from Tanzania for the purpose of enhancing the propagation or survival of the species in the wild. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act or ESA). As such, export of a hunted African lion from Tanzania requires prior issuance of a CITES export permit from the CITES Management Authority of Tanzania, and import into the United States requires prior issuance of an ESA import permit by the U.S. Fish and Wildlife Service (Service). The Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting import of a trophy would enhance the propagation or survival of the species in the wild.

After evaluating the available information submitted with the application, information provided by the government of Tanzania, and other information available to the Service, the Service has determined that the importation of the sport-hunted trophy to be taken during October and November 2019, from the Lukwati Game Reserve, Chunya District, Chunya Msami, Chunya Lukwati and Piti West Concessions in Tanzania **meets** the enhancement criteria under 50 CFR 17.32.

The Service recognizes that legal, well-regulated hunting as part of a sound management program can benefit the conservation of certain species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. We consider whether the management program is actively addressing the current and longer term threats to the subspecies based on sound scientific principles. A management program for a species such as *P. l. melanochaita* is expected to address, at a minimum, an evaluation of population trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating whether the importation of Mr. Cusick's trophy of *P. l. melanochaita* would be authorized in accordance with our permit issuance criteria, we were particularly interested in examining how Tanzania'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. We evaluated how, and how well, the hunting component of the management program addresses these threats by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. We also considered how the participation of a U.S. hunter, in this case, Mr. Cusick, contributes to the overall management of lions within a country.

We work closely with the range countries and interested parties to obtain relevant information. The government of Tanzania has provided a series of documents, including Tanzania's "enhancement"[1] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Cusick's application, the Tanzania Wildlife Research Institute (TAWIRI), open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

II. U.S. Governance of the Lion:

On December 23, 2015, the Service published in the Federal Register a final rule that, effective January 22, 2016, listed the lion subspecies *P. l. melanochaita* (southern and eastern Africa) as a threatened species under the Act (USFWS 2015; 80 Fed. Reg. 79999); this species is regulated under a species-specific 4(d) rule of the Act, which is set forth at 50 CFR17.40(r).

Where a rule is promulgated for a threatened species under Section 4(d) of the Act, the rule contains the applicable prohibitions and exceptions for the specific species (50 CFR 17.31(c)). Under the 4(d) rule for *P. l. melanochaita* (50 CFR 17.40(r)), all of the prohibitions of 50 CFR 17.31 and permit provisions of 50 CFR 17.32 apply. The prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (which 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 a 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 these otherwise prohibited activities, including importation, under certain circumstances (e.g., scientific purposes or activities that enhance the propagation or survival of the species), in accordance with the Service's regulations at 50 CFR 17.32. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Tanzania, 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 (USFWS 2015; 80 Fed. Reg. 79999); 50 CFR 17.40(r)(2); 50 CFR 17.32(a)).

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 issuance criteria under 50 CFR 17.32. However, 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 has made the required enhancement finding based on this individual application to import a sport-hunted trophy of *P. l. melanochaita*; however as detailed below, relevant information obtained for the country as a whole has been considered, as it contains information pertinent to the Service's evaluation as required by the 4(d) rule for *P. l. melanochaita*.

[1] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

A. General ESA permitting requirements

As we explained when finalizing the 4(d) rule, our threatened species permitting regulations 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 population in the country where the specimen originated and whether that management of the population 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 Tanzania contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of Tanzania's lion management plan provides a net benefit to the subspecies and its ecosystem. For example, several components of a management plan by which trophy imports could meet the issuance criteria might be government incentives in place that lead to increased habitat protection for lions by private landowners and communities, and incentives provided to local communities that lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions.

The Service evaluates an application involving a *P. l. melanochaita* sport-hunted trophy 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), the following:

> (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.

B. IUCN guiding principles

In addition to these factors, specifically in relation to sport-hunting, in the 4(d) rulemaking for *P.l. melanochaita*, the Service explained it considers the publication, *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (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*. The Service has, therefore, considered these principles in conjunction with our threatened species issuance criteria in making our determination of enhancement concerning import of the sport-hunted *P. l. melanochaita* trophy that is the subject of this permit application. The IUCN 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". It recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and, more specifically, the conservation of the hunted species.(IUCN SSC, 2012)

The IUCN document lays out the following five guiding principles:

(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 developing enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the ESA. 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.

III. Basis for Finding:

As explained above, any person wishing to conduct an otherwise prohibited activity, including import of *P. l. melanochaita* specimens, must first obtain a permit as required by 50 CFR 17.32; issuance of an import permit for a sport-hunted trophy of *P. l. melanochaita* requires an enhancement finding.

The Service has made the required enhancement finding for this import permit based on this individual application to import a sport-hunted trophy of *P. l. melanochaita* taken in Tanzania. Additionally, as detailed below, relevant information obtained for Tanzania as a whole, has been considered. The government of Tanzania has provided a series of documents, including Tanzania's "enhancement"[2] and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16th Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Cusick's application, the TAWIRI, open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

On April 14, 2016, the Service sent a letter to Mr. Herman Keraryo, Acting Director of Wildlife for the Wildlife Division of the Ministry of Natural Resources and Tourism (MNRT), with a list

[2] Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

of questions that would aid the Service in evaluating the overall conservation and management of the lion population in Tanzania, 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* (IUCN SSC, 2012), as it provides useful principles, which, when considered in conjunction with the Service's permit issuance criteria, would aid the Service in making the required enhancement findings for permitting importation of sport-hunted lion trophies. In response to our April 14, 2016 letter, the MNRT provided a series of documents, including Tanzania's "enhancement" and non-detriment finding for lions.

Upon invitation, a U.S. delegation of Service personnel visited Tanzania in November 2018 to observe the challenges and successes of conserving wildlife, including lions, in Tanzania. This trip allowed first-hand exposure to the on-the-ground implementation of policies and procedures the government has put into place to conserve lions. Detailed discussions with government officials, national experts, land managers, game officers, village leaders, and leaders in the hunting industry, as well as site visits to different models of hunting operations, served to both substantiate and elucidate information provided in documents. We determined that the status of lions and the management approach of Tanzania are substantially as presented, conferring confidence to the conclusions drawn from information provided.

IV. Governance of Wildlife in Tanzania:

In Tanzania, wildlife resources, such as lions, are protected under several Acts of Parliament, establishing the authority for all aspects of wildlife management, including law enforcement activities. The **Wildlife Conservation Act** (WCA) of 2009, which replaced the original WCA of 1974, provides the legal framework for operation of the Wildlife Division under the MNRT, including the appointment of the Director of Wildlife. The WCA provides for the establishment of a Wildlife Protection Unit granted paramilitary status to protect wildlife against unlawful utilization, and a Wildlife Authority to manage all Tanzania wildlife located outside the boundaries of the National Parks and the Ngorongoro Conservation Area. The Wildlife Authority is also responsible for meeting international obligations involving wildlife conservation. The WCA ensures the protection of natural habitat and wildlife through the establishment of a network of Protected Areas (PAs), e.g., Game Reserves, Game Controlled Areas, Wildlife Management Areas, and areas such as wildlife corridors. The **National Parks Act** (CAP 282 R.E. 2002) establishes the legal authority for the creation and management of national parks, granting powers to the Director to enable maintenance and security within national parks, as well as the responsibility for the protection of their wildlife resources. The **Ngorongoro Conservation Act** (CAP 284 R.E. 2002) provides the legal framework for the existence of the multiple land use in the Ngorongoro Conservation Area, its Management Authority under the direction of the Conservator, and the authority for its maintenance and security. The **TAWIRI Act** (CAP 260 R.E. 2002) grants powers to the Director who is responsible for research involving wildlife, and for providing this information to the Wildlife Authorities.

The responsibility for managing Tanzania's wildlife currently falls primarily under four institutions. The **Tanzania Wildlife Research Institute** (TAWIRI) is responsible for conducting and coordinating wildlife research in Tanzania. It functions as the scientific authority for wildlife conservation and management, and the CITES Scientific Authority for Tanzania. The **Tanzania National Parks Authority** (TANAPA) is responsible for managing 15 National Parks with a

total area of 50,872 sq.km. In the national parks, only non-consumptive utilization (tourism game viewing) of wildlife resources is allowed. **Ngorongoro Conservation Area Authority** (NCAA) is responsible for management of only one area, the Ngorongoro Conservation Area, a protected area of 8,300 km^2. It is the only multiple land use wildlife area in Tanzania in which the consumptive utilization of wildlife is not permitted. Both TANAPA and NCAA are parastatal – public organizations, but not directly run by the government; all revenue is kept by the organizations for use in management of these areas.

The Wildlife Division has historically been responsible for the country's wildlife resources located outside the jurisdiction of the Ngorongoro Conservation Area and Tanzania National Parks. However, in response to concerns over questionable management practices and lack of adequate funding for the Wildlife Division to successfully manage wildlife resources, the **Tanzania Wildlife Management Authority** (TAWA) was established in 2014[3]. Also a parastatal organization, TAWA operates with significant autonomy and retains all revenue generated from hunting[4]. TAWA became operational in July 2016, and has since established an aggressive, proactive approach to protecting wildlife. In addition to conducting routine anti-poaching patrols, TAWA is actively building capacity with technology (e.g., GIS), relationships with local communities (e.g., intelligence-led operations), and collaborative efforts on an international scale.

TAWA is responsible for the management of 28 Game Reserves with an area of 112,564 km^2, approximately 38 Game Controlled Areas covering about 161,521 km^2, and Ramsar sites covering 249,856 km^2. There are also District Councils, local government institutions that work in collaboration with the TAWA. These councils oversee wildlife conservation issues and facilitate the establishment and management of Wildlife Management Areas (WMAs) on village lands.

WMAs were established as a new category of wildlife conservation areas consisting of settled and unsettled lands outside PAs, with the goal of allowing for rural communities and private landholders to manage wildlife on their land for their own benefit, shifting wildlife such as lions from a liability to an asset. The framework for WMAs was outlined in Tanzania's Wildlife Policy of 1998 (revised in 2007), with legislation established under the Wildlife Management Areas Regulations of 2002, authorizing the formal establishment of WMAs. From 2010 to 2014, over 1.3 million USD from hunting fees were disbursed to WMAs (TAWA, 2016). In 2012, Tanzania amended its Wildlife Management Area Regulations to provide a new basis for strengthening the links between local communities and wildlife management by addressing the issues of benefit sharing and control over concession allocations. Under the new regulations, the WMAs receive approximately 60-65% of the total hunting revenue occurring within the block. Additionally, WMAs gained the power to sign utilization contracts with the private sector, enabling seven WMAs to sign contracts with hunting operations worth more than 4.3 million USD (TAWA, 2016). The establishment of these WMAs has resulted in an additional 23,700 km^2 of Tanzania's land area being added to its conservation network and increased capacity for protected area management through the training of village game scouts and WMA managers.

The tourism industry, largely wildlife-based, contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates

[3] Prior to the establishment of TAWA, funding to the Wildlife Division was paid by the central treasury; inadequate funding left the Wildlife Division unable to effectively manage and protect Tanzania's wildlife resources.
[4] The mandate to collect and retain revenue from trophy hunting is enshrined in "The Wildlife Conservation (The Tanzania Wildlife Management Authority) Establishment Order 2014.

almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations. The three parastatal organizations, TANAPA, NCAA and TAWA, retain 100% of their revenue share. Both TANAPA and NCAA are generally self-sustaining; consequently, National Parks and equivalent areas such as Ngorongoro Conservation Area, with an area covering approximately 38% of all PAs in Tanzania, are adequately funded. The sustainable utilization of resources (i.e., hunting) accounts for 70% of TAWA revenue; therefore, the viability of TAWA will depend, in part, on sufficient revenue from safari hunting. In 2012/2013, the Government of Tanzania re-established the Selous Game Reserve Revenue Retention Scheme, whereby 50% of the revenue generated from photographic tourism and tourist safari hunting is retained in order to meet management and enforcement costs in the Selous Game Reserve, one of the largest protected areas in Africa. Again, the viability of the Selous will depend, in part, on sufficient revenue from safari hunting.

Tanazania is 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, Tanzania provided a copy of their CITES non-detriment finding (NDF) for lions, which finds that the export of the species will not be detrimental to the survival of the species in the wild.

Tanzania 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. As required of a member state, Tanzania has established management programs for the conservation and sustainable use of wildlife.

V. Status of Lions in Tanzania:

Approximately 40% of all lions in Africa are found in Tanzania (Riggio et al., 2013). The lion range in Tanzania covers over 90% of land (Mesochina et al., 2010), with four main subpopulations:

1. the Maasailand Ecosystem, which encompasses the Mara, Arusha Kilimanjaro and Manyara Regions of northeastern Tanzania;
2. the Kagera and Kigoma Regions of northwestern Tanzania;
3. the Rukwa, Tabora and Mbeya Regions of central and western Tanzania;
4. Selous Ecosystem, which encompasses the Lindi, Morogoro and Ruvuma Regions of southern Tanzania.

TAWIRI presents Tanzania's latest lion population estimates as 16,800 individuals (Mesochina et al., 2010), and 17,564 (12,208-19,320) (Ikanda & Packer, 2006). They estimate that 13,600 (or 81%) of these lions occurred within PAs and approximately 3,200 (or 19%) individuals occurred outside PAs. According to Riggio et al. (2013) and Björklund (2003), the minimum number of lions estimated to categorize an area as a lion stronghold is 500 individuals. The estimated population size of the four main lion ecosystems was 3,700 in the Maasailand Ecosystem, 520 in Kagera and Kigoma Regions, 2,300 in Rukwa, Tabora and Mbeya Regions, and 7,200 in the Selous Ecosystem.

Trend analysis of the lion population in Tanzania is limited due to the sporadic nature and variable methodology of past surveys, as well as the difficulty of obtaining precise lion counts (Brink, Smith, & Skinner, 2013; Funston et al., 2010), but it is suggested that, nationally, far fewer lions exist today than did 50 years ago (Ikanda, 2008). Available information suggests that this may be spatially variable, e.g., declining populations in Katavi and Tarangire (Bauer et al., 2015) and stable populations in the Selous Game Reserve (Packer et al., 2011).

VI. Management of Tanzania's Lion Population

In recognition of the role that Tanzania plays in the conservation of this species, a workshop was held in 2006 to assess available information and to set priorities for conservation of the lion in Tanzania. The Tanzania Lion and Leopard Conservation Action Plan (TAWIRI, 2009) provided an overview of this workshop and outlined a national strategic plan for lion conservation. Habitat loss and increased conflict with humans had been identified as the major threat to the species. The Tanzania Lion and Leopard Conservation Action Plan (Plan) concluded that, for those lion populations existing outside National Parks, well-run trophy hunting programs could be leveraged to successfully manage and conserve lions against these threats. To that point, the majority of permanent lion range in Tanzania lies within protected areas, 61% of which are designated as hunting areas (Mesochina et al., 2010).

A. Hunting:

Hunting of lions is allowed across much of Tanzania. Safari hunting occurs in areas known as hunting blocks, designated in Game Reserves, Game Controlled Areas, Open Areas, Forest Reserves and WMAs. Until recently, blocks were allocated using an administrative process. The government would invite hunting companies to apply to operate a hunting block; interested hunting companies were evaluated by the Hunting Block Advisory Committee. Hunting companies were allocated blocks for a period of five years, with a reporting requirement on the third year to determine compliance under the terms outlined within the hunting block regulations (TAWA, 2016). However, in 2017, it was announced that the block allocation process would be amended to introduce an auction system.

Wildlife hunting in Tanzania is based on hunting regulations set forth in Tourist Hunting Regulations No. 306 (2002). The regulations specify the fees for hunting different species, and further specify a minimum number of hunting days. Hunters are required to purchase a minimum 21-day safari in order to request a permit for the harvest of lions, as well as other specified animals (e.g., elephant, leopard). Hunters must pay a number of different fees for permits and licenses to be granted harvest authorization. The game fee to hunt a lion is the second highest game fee in Tanzania, second only to elephants.

A quota system historically was the primary method of regulating trophy hunting in Tanzania. Annual harvest quotas have been lowered over the past decade, from 520 in 2008-2009 (Lindsey et al., 2013) to 315 in recent years (TAWA, 2016). In 2016, the annual quota was further reduced to 200 individuals (TAWA, 2016). An annual quota of 200 individuals is well within the suggested sustainable 1 lion/2000 km^2 harvest rate identified by Packer et al. (Packer et al., 2011), and 25% below the sustainable harvest level suggested by TAWIRI (TAWA, 2016). However, the Plan noted the lack of scientific justification underlying that system. Furthermore, a quota system is reliant on

accurate population estimates, a near impossibility with lions. A model that simulated the dynamics of populations as a function of both quota size and age at harvest showed that there is almost no negative affect on population size when hunting is restricted to males six years or older (Whitman, Starfield, Quadling, & Packer, 2007). Restricting lion hunting by age would reduce the reliance on population estimates – an intensive and expensive effort that does not reliably return accurate results – while minimizing the effect on a lion population. Tanzania was the first country in African lion range states to officially establish age restriction rules, prohibiting hunting lions of an age below six years (section 27(1) of the Tourist Hunting Regulations of 2015). Violations of this regulation can result in penalties for the professional hunter guiding the offending hunter, including fees and revoking of the professional hunter's license.

Although inspection of trophies are required prior to export, the fundamental difficulties of accurately estimating lion age, as well as a disregard for these regulations, can result in the take of lions younger than six years. Tanzania has consequently maintained a quota system, set by hunting block according to the lions harvested during the previous hunting season. If a trophy lion is estimated to be 4-6 years, the hunter/client may export that lion, but the quota for the hunting block where the trophy was taken is reduced for the following hunting season. If a trophy is taken below the age of 4, there is a reduction of the hunting block's quota of harvestable lions by 2 and potential cancellation of the hunter's license along with other penalties such as the trophy not being eligible for export. If the trophy meets the criteria of 6 years of age or older, the hunting block's quota remains unchanged for the following hunting season. According to MNRT, these regulations have been in place since the 2012/2013 hunting season. For each trophy harvested, a compulsory hunter evaluation form, photos along with presentation of lion skull to officials for inspection and measurements, including tooth x-rays, are necessary prior to the issuance of an export permit (MNRT, 2015; TAWA, 2016).

B. Human-Lion Conflict:

It is difficult to estimate how many lions are killed illegally each year; however, retaliatory killings may be as high as 200 individuals annually (TAWA, 2016). Lions are provided protection from illegal or retaliatory killing under the Fourth Schedule due in part to human/livestock-conflict under the Dangerous Animals Damage Consolation (Government Notice No. 146) of 2011; unauthorized personnel are not permitted to kill a conflict lion unless under exceptional circumstances. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

VII. Evaluation:

In evaluating whether the importation of Mr. Cusick's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our permit issuance criteria, we examined how Tanzania'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. We considered whether the management 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 evaluated government incentives designed to increased habitat protection for lions by private

landowners and communities, and incentives provided to local communities designed to lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions. We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake. 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. As such, we examined if the trophy hunting provides financial/resource 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 a U.S. hunter's, in this case, Mr. Cusick, participation in the hunting program contributes to the overall management of lions within the country.

As stated earlier, the Service has evaluated this application in accordance with our 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 based on information available to the Service, we have been able to determine for this application that the import of the wild lion trophy animal would enhance the propagation or survival of the species in the wild and qualifies 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 proposed activity in this permit application (import of a trophy hunted lion from Tanzania) has demonstrated the ability to contribute towards positive conservation outcomes that mitigate or improve the status of lions throughout their range while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion that collectively contribute towards continued population declines.

Tanzania faces a growing human population, and a subsequent development of land and increasing rates of human-wildlife interactions. Protection of suitable habitat for both the lion and its prey is essential for the survival of the lion, as well as developing and sustaining the local communities' support for such policies. Wildlife protected areas, in various forms, cover about 40% of Tanzania's land area, and safari hunting has created a financial incentive to maintain these protected areas as a land use. Both the consumptive and non-consumptive utilization of wildlife resources contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations.

The companies awarded a hunting block are in a key position to conserve this land for wildlife, and are annually evaluated by the Tanzania government on several criteria, including the maintenance of prey populations, contributions/provision of benefits to the local villages, improvement to infrastructure, protection of the environment, and anti-poaching operations.

Mr. Cusick will hunt with Old Nyika Safaris LTD, a subsidiary of McCallum Safaris. McCallum Safaris has developed several programs by which to address the main threats to lion populations.

- The company, in collaboration with government game scouts, maintains significant anti-poaching efforts to protect against potential threats to habitat loss and the loss of game. Anti-poaching teams include government scouts with the ability to arrest, and company scouts with years of anti-poaching training and experience. The company has established a network of informants in the villages, and maintains the road system within the hunting area, both of which aid in the monitoring and apprehension of active poachers. The company invests a significant amount of resources into anti-poaching activities, including funding their own poaching teams, purchasing state-of-the-art equipment, and contributing to government anti-poaching operations occurring in areas surrounding their holdings. The successes of these anti-poaching activities include the removal of illegal fishing camps; the seizure of weapons, vehicles, and equipment; and the arrest and prosecution of poachers. The active monitoring by the anti-poaching teams has resulted in a decrease in the occurrences of timber felling.

- While there has been no instances of human-lion conflict in the hunting areas, the company has established an agreement to compensate the owner of the full value of lost livestock.

- The company protects prey base species by setting low off-take quotas, and mandating that professional hunters take only mature adults.

- McCallum Safaris has adopted a company hunting policy to which all professional hunters must adhere, or else lose employment. This policy reiterates the country's age restriction on lion off-take, prohibiting the take of lions under the age of six, of lions accompanied by a pride with cubs or sub-adult lions, or of lions accompanied by a pride of lactating females.

- The company has implemented a lion-monitoring program that allows personnel to view and track the movement of lions. With this data, the company can efficiently and accurately determine the age and status of lions, reducing the take of young males or males accompanied by a protected class of individuals.

It has been stated that upwards of 200 lions are killed annually due to preemptive strikes or as retaliatory actions after some form of direct loss is experienced by an individual or community (TAWA, 2016). In the Ruaha communities surrounding hunting blocks and the Ruaha National Park, researchers reported 35 large carnivores were killed over an 18-month period. Similarly, Lichtenfeld et al. (2015) reported that in 12 communities of the Maasai Steppe region, more than 50 attacks by large carnivores on livestock resulted in retaliatory killing of 72-84 lions. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

As described above, we have determined that the government of Tanzania and McCallum Safaris contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of

lions in Tanzania. Further, the fees garnered through Mr. Cusick's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, 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:

A myriad of issues and factors, largely related to an increasing human population, complicate and put at risk the management of Tanzania's wildlife (Kideghesho, Rija, Mwamende, & Selemani, 2013). It is likely that the lion populations that exist outside of protected areas will continue to decline (Riggio et al., 2013), making the existence of these protected areas all the more important. The trophy-hunting program in Tanzania provides a revenue source necessary to maintain and manage protected areas from encroachment or elimination.

It is a widely supported belief that increasing the benefits for those who live with and bear costs of wildlife damage or injury by wildlife can increase tolerance of wildlife, especially of large carnivores (e.g. lions) (Bencin, Kioko, & Kiffner, 2016; Lindsey et al., 2013; Winterbach, Winterbach, Somers, & Hayward, 2012). Mr. Cusick will hunt with a subsidiary of McCallum Safaris, which, as outlined below, will provide an indirect benefit to the lion population by generating revenue to help support and maintain a hunting block where lions are found. McCallum Safaris is required by Tanzanian law to pay directly a $5,000 community development fee to the villages in the hunting area. The company has contributed significantly more than the base requirement, aiming to develop and maintain a strong relationship with these villages. These contributions have paid school fees, constructed classrooms, purchased books, and invested in solar power. In addition to direct financial assistance, the company also employs villagers in both permanent positions and short-term projects; conducts conservation workshops to educate the local residents of the importance of wildlife and hunting in their daily life, and the negative effects of poaching. The Service is further encouraged by the recent action taken by the MNRT to amend the WMA regulations enabling these communities to receive a greater proportion of revenues returned on wildlife uses.

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:

The government of Tanzania has implemented a number of policies and regulations to monitor and control the harvest of lions in the country. Therefore, the issuance of an import permit for a lion legally hunted in Tanzania does not conflict with any programs intended to enhance the survival probably of the species in Tanzania.

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, almost 40% of all remaining lions are found in Tanzania. The lions located within protected areas are under the legal authority of MNRT, as well as subjected to direct management activities by hunting companies. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the maintenance of these protected areas by hunting companies is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. The cost of operating a hunting block is considerable, and lion safaris are a large source of revenue for hunting companies. This revenue is, in part, what allows the company to first and foremost maintain a presence in this protected area, and subsequently maintain an anti-poaching program, and to aid in local community development, all factors which reduce the threats faced by lions.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt proposed in Mr. Cusick's application contributes to reducing the threat of extinction of lions in Tanzania. The utilization of hunters such as Mr. Cusick in supporting the safari hunting industry is an important element of the success of lion management in Tanzania.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduce the threat of extinction facing lions in Tanzania.

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. 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 legal and sustainable 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.

The long-term survival of lions in Tanzania is tied directly to the success, both ecologically and economically, of the protected areas. Based on our understanding of the hunting block allocation

and management, companies must submit annual reports that address several criteria, including the maintenance of key prey populations, contributions to the local villages, improvement to infrastructure and protection of the environment, and anti-poaching operations.

Therefore, based on the information available to the Service, the applicant will hunt on a hunting block that carries out their management practices in accordance with national regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective stated in the application.

VIII. Conclusion

As stated earlier, this application received by the Service for the import of a sport-hunted trophy lion from Tanzania has been evaluated on an individual basis. The major threat facing lions today is the loss of habitat to humans, and the subsequent consequences of living among humans (e.g., decrease of prey base due to bush-meat consumption, increase in human-lion conflict). The occupation and maintenance of hunting areas by hunting concessions -- an industry supported by U.S. hunters such as Mr. Cusick -- protects lion and prey habitat through legal hunting by preventing conversion of such land to other uses, thereby contributing to the enhancement of this species. In addition, the financial benefits to local communities generated from lion safari hunting creates incentives for protection of lions, resulting in fewer lions lost as a result of human-lion conflict, which further contributes to enhancement of this species. Given the status of lions in Tanzania and the level of management and oversight provided to them, it appears that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant will hunt on a hunting block that is actively managing lions in a manner that mimics natural processes. The applicant attests in the application that the hunt will occur on a properly licensed hunting block, and this finding is contingent on the hunting block where the lion will be taken, having been properly licensed and fully in compliance with national and local regulations.

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 the sport-hunted trophy of this wild lion will enhance the propagation or survival of the species in the wild. Therefore, the Service **is able to authorize the import of one male trophy lion taken from the wild in Tanzania, to Todd D. Cusick, Provo, Utah.**

Julia Butzler, Ph.D., Senior Biologist
Branch of Permits
Division of Management Authority

Mary Cogliano, Ph.D., Chief
Branch of Permits
Division of Management Authority

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Permit Number: MA04657D-0
Effective: 07/22/2019 Expires: 07/21/202(

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

Amy Brisendine for
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
TODD DENNIS CUSICK
(b) (6) [redacted]
PROVO, UT 84604
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 Tanzania 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 2019 hunting season.**
D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tanzania for the 2019 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 Tanzania.
F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.
G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.
H. Valid for use by permittee named above.
I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Form 3-200-52

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD JUL 9 2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. **Instructions on how to make your application complete and help avoid unnecessary delays are attached.**

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
CUSICK	TODD	DENNIS	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
	(b) (6)		

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Provo	UT	84604		USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions* [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

ext page

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for a lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to these application types to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

   SAME

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Todd Cusick (b) (6) [redacted]

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

   ☒ No ☐ Yes

   If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court; and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. **Permit number.** Enter the permit number to be reissued/renewed/amended. Prt#: MA046570-0

5. Submit the original permit with this application.

6. **Past activities.**

   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

7. **Annual Report**. If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

8. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

9. **Certification -** Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

      I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

      Permittee's signature: (b) (6) Date: 6-30-20

   b. For **CHANGES** to original application:

      On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we may need to request additional information regarding the changes after reviewing your initial request.

      I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

      Permittee's signature: _____ Date: _____

All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

LION TANZANIA ESA TROPHY

Permit Number: MA04657D-0
Effective: 07/22/2019 Expires: 07/21/2020

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

Amy Brisendine for
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD DENNIS CUSICK
(b) (6) [redacted]
PROVO, UT 84604
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 Tanzania 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 2019 hunting season.**

D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tanzania for the 2019 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 Tanzania.

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).

TO: UWFWS

FROM: TODD CUSICK

DATE: 6/30/20

SUBJ: PERMIT MA04657D-0 – attachment to Form 3-200-52 extension/renewal

All information on the original permit remains correct. The lion was harvested in October 2019 as expected. The government of Tanzania has been slow (their excuse continues to be COVID-19) in aging the Lion for their governmental processing.

Yesterday I was informed that the aging report would not be done in time to get the lion to a US port by 7/21/20.

Please add 120 days to this permit time. Please note that I was issued this permit on 7/22/19 which meant I had to schedule and execute a hunt in 120 days because Tanzania hunting has to be done by November 1st. I have been diligently trying since November of 2019 to get the Lion aged so Tanzania would release it. I believe we are close.

I have also attached correspondence related to this with my agent in Tanzania and my importer.

Please call me at (b) (6) if there are any questions.

From: **Helen Angelides** helen@dmstz.com
Subject: RE: LION IMPORT PERMIT
Date: July 1, 2020 at 2:45 AM
To: Todd Cusick (b) (6)
Cc: helen@dmstz.com

HA

Dearest Todd,

I hope that all is well.

As Vincent has indicated the Lion ageing was finally done by the authorities but in their usual laid-back manner, we do not expect the findings back for at least a month.
We will of course be ready to ship as soon as we get the results, but we are worried that this may not be before the date that your permit expires.
The US FWS has said the following regarding Lion permit extensions.

I can speak to the re-issuance of the import permits. So long as the import permit was already issued and the import has not yet occurred, we may re-issue the permit and the permittee may request to do so using Form https://www.fws.gov/forms/3-200-52.pdf

Please let me know if you need any assistance from my side and we will keep you posted on the status of the findings.

Kind regards.

Helen Angelides

Old Nyika Safaris Ltd. & Safari Royal Holdings Ltd.
P. O. Box 4
Arusha
Tanzania
Tel: +255 784 400685

From: Todd Cusick (b) (6)
Sent: Monday, June 29, 2020 8:42 PM
To: Vincent Kimaro <vincent@dmstz.com>
Cc: Helen Angelides <helen@dmstz.com>
Subject: Re: LION IMPORT PERMIT

How long do you expect it to take to get the results?

Todd Cusick

On Jun 29, 2020, at 1:37 AM, Vincent Kimaro <vincent@dmstz.com> wrote:

Dear Todd,
I hope all is well.
The lion aging exercise has been done by our Tanzania Wildlife Management Authority officials.
We are now awaiting for the results which we expect to get them soon.
Kindly note that your lion import permit no MAO O4654D -O expires on 07/27/2020 .
Can your please ask for extension of the validity to enable us export all your trophies once we get the lion aging results.

Thanks
Vincent Kimario

From: Todd Cusick (b) (6)
Subject: Re: CITES permit for leopard and lion
Date: July 1, 2020 at 3:13 PM
To: Maria Europa-Felix maria@b.hunter-international.net
Cc: Maria Europa-Felix maria@b.hunter-international.net, Lynn Javier lynn@b.hunter-international.net, Angie Barragan info@b.hunter-international.net, Janet Campos trophies@b.hunter-international.net, Vincent Kimaro vincent@dmstz.com

Dear Hunter International:

I am applying for an extension to the Lion permit.

Is the leopard CITES permit being handled by you?

Todd Cusick

On May 25, 2020, at 10:12 AM, Helen Angelides <helen@dmstz.com> wrote:

Dear Maria,
Thank you for the information.
We will plan to ship the Lion as soon as we have the ageing results. It is of course extremely frustrating how long the authorities are taking to complete the ageing exercise in Tanzania.
Very discouraging to hear that the Leopard import CITES takes so long these days. It used to be quite quick.
The US Fish & Wildlife have not told us anything about an enhancement report for Leopard but they do have our Lion Enhancement report.
Anyway, we hope that the ageing and the licenses will all fall in place and we can proceed with the export.
Kind regards.

Helen Angelides

Old Nyika Safaris Ltd.
P. O. Box 4
Arusha
Tanzania
Tel: +255 784 400685
TIN: 100-659-638
VRN: 11-012124-R

From: Maria Felix <maria@b.hunter-international.net>
Sent: Sunday, May 24, 2020 8:09 PM
To: Helen Angelides <helen@dmstz.com>
Cc: Todd Cusick (b) (6) ; Lynn Javier <lynn@b.hunter-international.net>; Angie Barragan <info@b.hunter-international.net>; Janet Campos <trophies@b.hunter-international.net>; Vincent Kimaro <vincent@dmstz.com>
Subject: Re: CITES permit for leopard and lion

Hi Helen,

Thank you for these information. Can you please confirm if Old Nyika Safaris would be the exporter/shipper on the TZ cites permit? Also, please note the leopard import permit processing can take 8 to 10 months or longer depending on how long the "enhancement findings" will take. This is another layer of review added by Fish & Wildlife last year so the issuance of permit takes much longer than it used to. If you can expedite the lion ageing process and get all paperwork done by end of this month that would be great and ship to the U.S. by first week of July without the leopard. This would be the ideal scenario otherwise the lion import permit will need to be renewed.

Maria Felix

Proud NRA & SCI Life Member

President/CEO

Hunter International Brokerage Services, Inc.

New Office Address:

5653 Stoneridge Drive, Suite 107

Pleasanton, CA 94588

Tel (925) 417 5270

Fax (925) 417 0170

Email: maria@b.hunter-international.net

Website: www.hunter-international.net

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On Sun, May 24, 2020 at 8:33 AM Helen Angelides <helen@dmstz.com> wrote:

> Dear Maria,
>
> Thank you for your email.
>
> Please find attached copies of Mr Cusick's hunting permit and also his Trophy register for your record / reference.

We will require a Leopard Import CITES for Mr Cusick and would like to have it in hand so that we can ship as soon as the Lion ageing has been done.
We do have the Lion import License but cannot export because the required Lion ageing to be done by the authorities is still pending. The Lion import permit expires on the 21st July 2020 and we are pushing for the ageing to be done constantly so as long as we have all the other paperwork ready we will export as soon as the ageing is done.

The Leopard was taken in;
Country: Tanzania
Region: Mbeya
Area: Chunya Msami Open Area
Date taken: 20th October 2019
Coordinates: UTM 469776 / 9166127
City where trophy was taken to: Arusha

Current Location of the Trophy is Arusha, Tanzania

Exporter details
OLD NYIKA SAFARIS LTD.
P. O. BOX 4
ARUSHA
TANZANIA

Please let us know if you require anything further..

Take care and stay safe.

Kind regards.

Helen Angelides

Old Nyika Safaris Ltd.
P. O. Box 4
Arusha
Tanzania
Tel: +255 784 400685
TIN: 100-659-638
VRN: 11-012124-R

From: Maria Felix <maria@b.hunter-international.net>
Sent: Friday, May 22, 2020 8:00 PM
To: Todd Cusick (b) (6)
Cc: Helen Angelides <Helen@dmstz.com>; Lynn Javier <lynn@b.hunter-international.net>; Angie Barragan <info@b.hunter-international.net>; Janet Campos <trophies@b.hunter-international.net>
Subject: Re: CITES permit for leopard and lion

Okay then we can apply for your leopard import permit.

Helen - please provide information on highlighted items on the leopard application form. The shipper or exporter name on your export cites permit is very important. It must match the U.S. import permit as noted on block 8(a). If possible, please send a photo of the leopard with the TZS CITES tag attached on the skin.

<image001.png>
Thanks,

Maria Felix
Proud NRA & SCI Life Member
President/CEO
Hunter International Brokerage Services, Inc.

New Office Address:
5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588
Tel (925) 417 5270
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Email: maria@b.hunter-international.net
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On Fri, May 22, 2020 at 9:50 AM Todd Cusick (b) (6) wrote:

> I have not applied for leopard CITES.
>
> I obtained my USFWS permit for the Lion with the help of Conservation Force.
>
> Helen, your thoughts?

Todd Cusick

On May 22, 2020, at 10:48 AM, Maria Felix <maria@b.hunter-international.net> wrote:

Hi Todd,

The Tanzania CITES **EXPORT** permits for the lion and leopard will be applied for by the shipper - I assume that's Helen?

With regards to your leopard import permit, did you apply for it? Who applied for your lion permit?

What I strongly suggest is to ship the lion right away - if they can secure the export cites permit asap! But if they are required to have it "aged" first before they can get the CITES permit, maybe Helen can tell us how long will that take. In my opinion, between now and July 21 is not enough time for them to achieve both BUT I could be wrong!

Maria Felix
Proud NRA & SCI Life Member
President/CEO
Hunter International Brokerage Services, Inc.

New Office Address:

5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588
Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

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permanently delete or destroy this e-mail.

On Fri, May 22, 2020 at 9:35 AM Todd Cusick <(b) (6) > wrote:

> Maria:
>
> I am confused.
>
> The operator (I copied Helen on this), in the attached email, asked that we obtain the CITES permits. Can you not do that for me?
>
> You may recall, I have an elephant that has been stranded in Namibia for 4 years now because the permit expired. I do not want to repeat that.
>
> Todd Cusick

> On May 22, 2020, at 10:24 AM, Maria Felix <maria@b.hunter-international.net> wrote:
>
> Hi Todd,
>
> You have a lion import already so that's good although it is expiring next month. I wonder why the lion was not shipped right away? WE can apply for renewal but the reissuance process may take a while. I am guessing anywhere from 2 to 6 months??
>
> If you do not have a leopard import permit, we can apply for you for a fee. Note that the processing of leopard permit can take anywhere from 8 to 10 months or longer depending on how long F&W "enhancement findings" will take.
>
> Meanwhile, I am not confident that shipper will be able to do the lion ageing and secure CITES export permits **BEFORE** your lion import permit expires on 7/21. From what I know, these things take a while and considering most government offices in TZ are closed or partially open, there will be delays in processing for sure - plus the fact that airlines in TZ are not back in full operations yet. We have a shipment that is booked to leave on 5/25 from DAR to SFO. If shipper miss this flight or cargo is offloaded, we were told the next flight out is a month away.

Please let me know exactly what your plan is for this consignment. Did you want all trophies shipped one time?

Maria Felix
Proud NRA & SCI Life Member
President/CEO
Hunter International Brokerage Services, Inc.

New Office Address:

5653 Stoneridge Drive, Suite 107
Pleasanton, CA 94588
Tel (925) 417 5270
Fax (925) 417 0170
Email: maria@b.hunter-international.net
Website: www.hunter-international.net

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On Fri, May 22, 2020 at 9:00 AM Todd Cusick (b) (6) wrote:

> Dear Hunter International:
>
> Can you assist me with a CITES permit for a leopard and a lion?
>
> Is the attache information sufficient?
>
> Todd Cusick

NOTE TO FILE/PHONE CONVERSATION			
NAME: Todd Cusick			**PRT#:** 04657D
TIME: 2:30pm	**DATE:** 7/10/2020	**PHONE N** (b) (6)	
SUBJECT: Following up on voicemails			

He has already sent in a re-issuance application (he mailed it last week). He is waiting on the paperwork from Tanzania to export the trophy.

I told him that if nothing changed in his application, he shouldn't have much to worry about, but that I am unfamiliar with lion trophy imports and that process.

I let him know that we are having delays with our mail intake process as we may have received it, but it is not in our system yet.

Signature:

Division of Management Authority

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
Instructions on how to make your application complete and help avoid unnecessary delays are attached.

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
Lavelle	Thomas	Michael	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)	(b) (6)	(b) (6)	(b) (6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Horace	North Dakota	58047	USA	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the **nonrefundable application processing fee** in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other a… I certify that the information submitted in this application for a permit is complete and accura… false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

6/26/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   Same

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.

   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, Chipondo Pools, boundary of Gonarezhou National Park

   b. Date wildlife is to be hunted:

   2/2019

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Cliff Walker
   Cliff Walker 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).

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: CUAN MEREDITH
Business Name: TROPHY CONSULTANTS INTERNATIONAL
Address: 4 JOSIAH CHINAMANO ROAD, BELMONT
City: BULAWAYO,
State/Province:
Country, Postal Code: ZIMBABWE

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted?

Please see attached + forthcoming report from Cliff Walker Safaris

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

SAME

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted

SAME

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: [redacted] Date: 6/26/2018

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.

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).

THOMAS LAVELLE

From: Cliff Walker <cliff@cliffwalkersafaris.com>
Sent: Thursday, June 14, 2018 11:20 AM
To: THOMAS LAVELLE
Subject: Re: [EXTERNAL] RE: FW:

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Tom ,

Yes I under and I can try give you want I have given other clients , it's always hard to answer some questions as it's government, but ,
1) population of elephant , 14000
3 times the carrying capacity of the area
2) this is a communal land , money is paid directly to villages that live in the area
So far a clinic has been built , a school,several grinding mills bought and set up , boreholes drilled and equipped
Due to the large population of people in this area it is impossible to police , with the tribesman benefitting directly from wildlife , poaching has become almost non existent , not one elephant has been poached in this area in the last 18 years.
3) activities done throughout the last several years
Mostly educating the local population on the benefits of wildlife conservation , most anti poaching scouts imployed in the neighboring Gona Re Zhou park are from the surrounding communal land , many families have atleast one family member imployed in the wildlife industry.
4) area is Zimbabwe , Chibwedziva

The Gonerezhou National parks holds around 20 000 elephants at any one time ,

A quota of 4 elephant area shot in this area , year round ,

Regards
Cliff

Cliff walker
www.cliffwalkersafaris.com
www.collectafrica.com
" Life is made of two dates and a dash
Make the most of the dash "

On 14 Jun,2018, at 16:30, THOMAS LAVELLE [redacted] (b) (6) wrote:

> Cliff it appears that they are going to consider if all the paperwork is complete including any documentation from local governing bodies that substantiates the stability of the species (all b.s.) but if you can put anything you have together it would be worth a shot. I know how difficult the US fish and wildlife is to deal with and it's all about the paper work.
>
> Thanks

Album: Elephants' paradise - Zimbabwe's Gonarezhou National Park

Source: Xinhua | 2017-02-04 19:36:52 | Editor: huaxia

An elephant walks in the Gonarezhou National Park, Zimbabwe, on Jan. 30, 2017. Situated in southeastern Zimbabwe, the 5,000 sq km Gonarezhou National Park is the second largest national park in the country. Gonarezhou, which is translated as "the place of elephants" in local Shona language, also has one of the world's highest elephant population densities-2 elephants per sq kilometers-with an estimated total elephant population of 11,000. (Xinhua)

NAIROBI, Feb. 4 (Xinhua) -- Zimbabwe's Gonarezhou National Park boasts one of the world's highest elephant population densities.

Situated in southeastern Zimbabwe, the 5,000 sq km Gonarezhou National Park is the second largest national park in the country.

An elephant walks in the Gonarezhou National Park, Zimbabwe, on Jan. 30, 2017. Situated in southeastern Zimbabwe, the 5,000 sq km Gonarezhou National Park is the second largest national park in the country. Gonarezhou, which is translated as "the place of elephants" in local Shona language, also has one of the world's highest elephant population densities-2 elephants per sq kilometers-with an estimated total elephant population of 11,000. (Xinhua)

Elephants walk in the Gonarezhou National Park, Zimbabwe, on January, 30, 2017. Situated in southeastern Zimbabwe, the 5,000 sq km Gonarezhou National Park is the second largest national park in the country. Gonarezhou, which is translated as "the place of elephants" in local Shona language, also has one of the world's highest elephant population densities-2 elephants per sq kilometers-with an estimated total elephant population of 11,000. (Xinhua)

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African Journal of Ecology

Original Article

Trends in populations of elephant and other large herbivores in Gonarezhou National Park, Zimbabwe, as revealed by sample aerial surveys

Kevin M. Dunham

First published: 19 June 2012
https://doi.org/10.1111/j.1365-2028.2012.01343.x
Cited by: 12

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Abstract

EN FR

For 30 years, regular aerial surveys in Zimbabwean protected areas were funded, designed and executed primarily to estimate elephant numbers. Other large herbivores were recorded, even though some species were not easily seen from the air in savannah woodlands. Population estimates for species other than elephant provided indices of abundance that could be used to determine temporal trends in population size. This study tests for significant trends in the abundance of large herbivores in Gonarezhou National Park, assuming that data from aerial sample surveys designed for elephant also provide accurate estimates of real trends in the populations of other herbivores. For each species, the exponential rate of population change was calculated using weighted regression, with the variance of this rate based on the sampling variances of the population estimates. Significant population trends were detected for eight species. Before the 1992 drought, elephant number was held approximately constant by frequent culls, but afterwards, it increased at a mean annual rate of 6.2% (confidence limits 4.0% and 8.6%). Elephants in cow herds increased at 7.3%, significantly faster than elephants in bull herds (−0.5%). Buffalo,

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Number of times cited: 12

Henry Ndaimani, Amon Murwira, Mhosisi Masocha, Tawanda W. Gara and Fadzai M. Zengeya, Evaluating performance of aerial survey data in elephant habitat modelling, *African Journal of Ecology*, **55**, 3, (270-281), (2016).
2017 International Conference on Unmanned Aircraft Systems (ICUAS) Miami, FL, USA 2017 International Conference on Unmanned Aircraft Systems (ICUAS) IEEE , (2017). 978-1-5090-4495-5 Sattar Dorafshan, Marc Maguire, Nathan V. Hoffer and Calvin Coopmans Challenges in bridge inspection using small unmanned aerial systems: Results and lessons learned , (2017). 1722 1730 7991459 , 10.1109/ICUAS.2017.7991459 http://ieeexplore.ieee.org/document/7991459/

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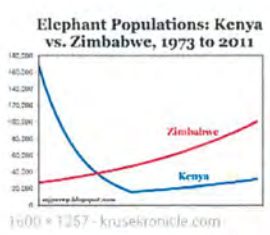

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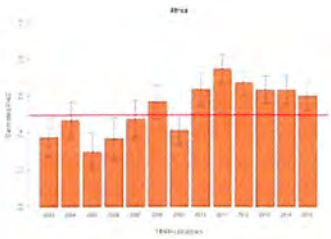

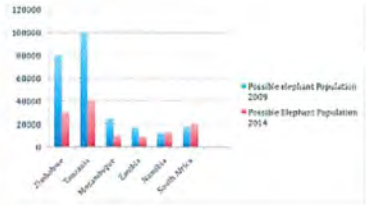

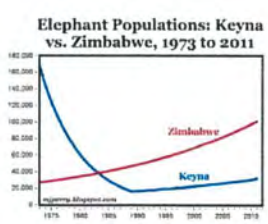

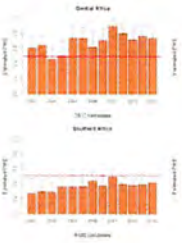

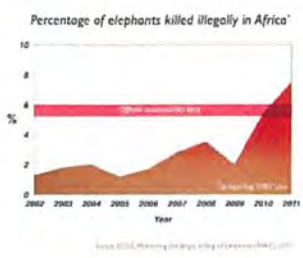

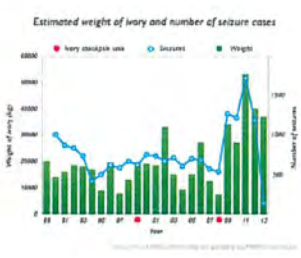

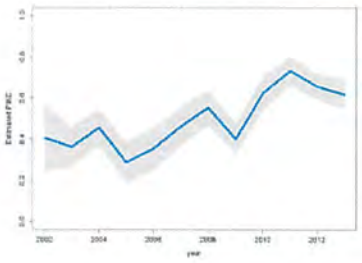

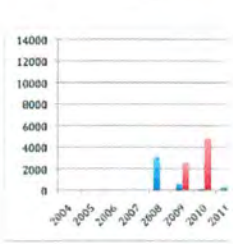

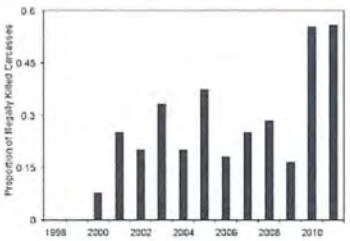

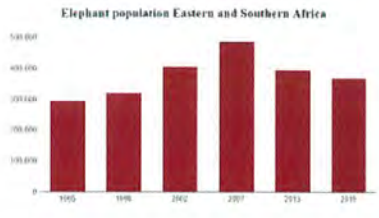

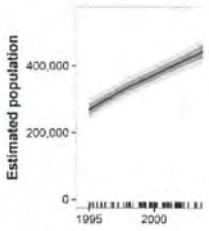

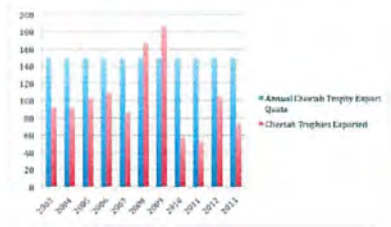

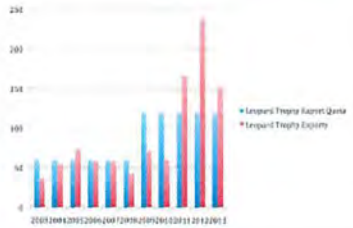

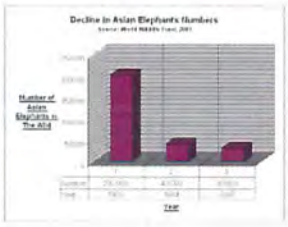

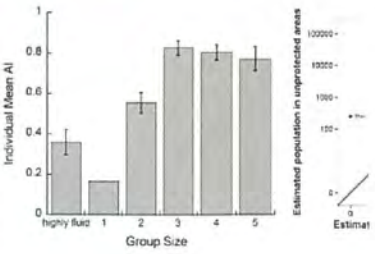

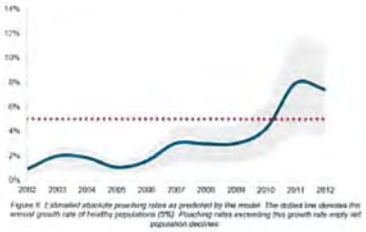

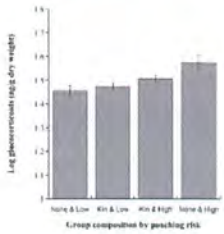

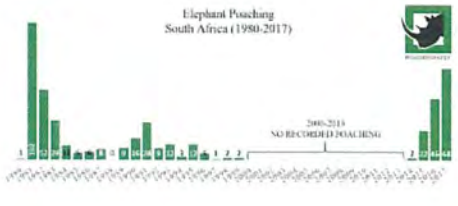

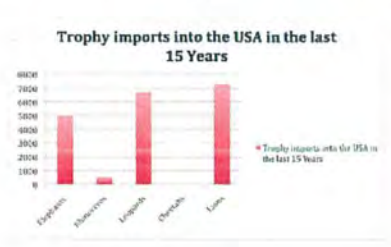

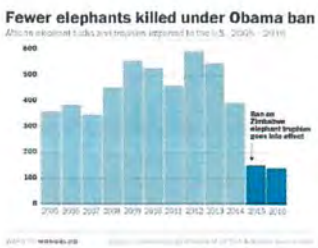

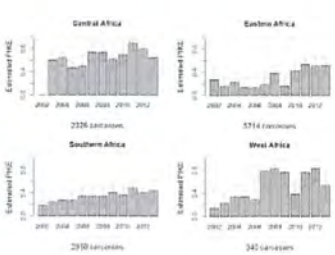

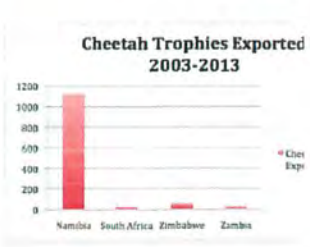

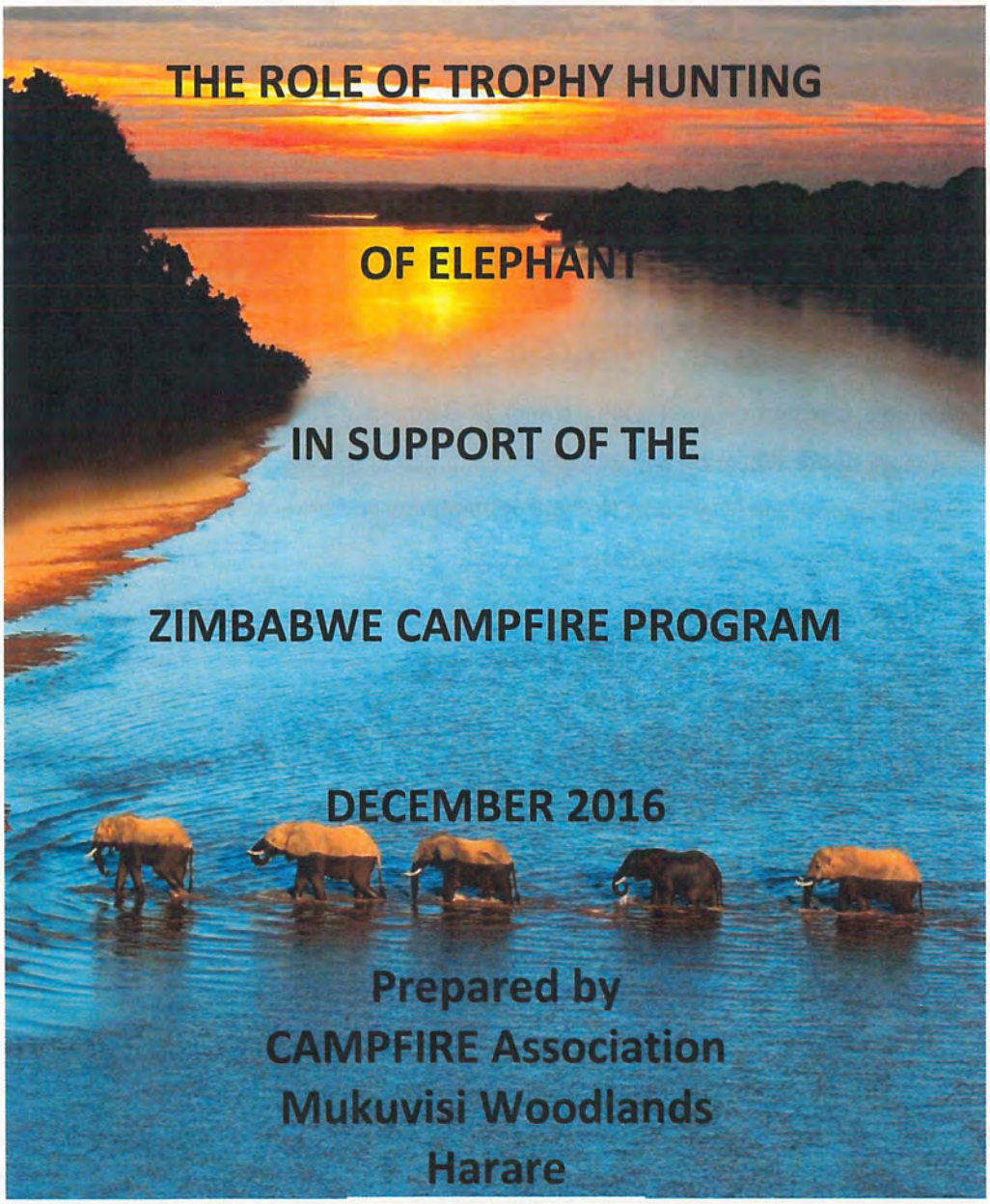

THE ROLE OF TROPHY HUNTING

OF ELEPHANT

IN SUPPORT OF THE

ZIMBABWE CAMPFIRE PROGRAM

DECEMBER 2016

Prepared by
CAMPFIRE Association
Mukuvisi Woodlands
Harare

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ACRONYMS AND ABBREVIATIONS

AA	Appropriate Authority
CA	CAMPFIRE Association
CAMPFIRE	Community Areas Management Program for Indigenous Resources
CCG	CAMPFIRE Collaborative Group
DNPWLM	Department of National Parks and Wildlife Management
ESA	Endangered Species Act
FWS	United States Fish and Wildlife Service
RDCs	Rural District Councils
SOAZ	Safari Operators Association of Zimbabwe
USAID	United States Agency for International Development
ZPHGA	Zimbabwe Professional Hunters and Guides Association
ZPWMA	Zimbabwe Parks and Wildlife Management Authority

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Cover photo: Lin Berrie, Chilo Lodge, Mahenya CAMPFIRE Area

Executive Summary

In April 2014, the United States Fish and Wildlife Service (FWS) suspended the import of elephant trophies taken in Zimbabwe. In March 2015, the suspension was extended to include future hunting seasons. For it to reverse this decision, the FWS must make a finding that the killing of the animal whose trophy is intended for import would enhance the survival of the species in the wild. The Zimbabwe Parks and Wildlife Management Authority (ZPWMA) defended its position and provided the FWS with significant amounts of information and data related to elephant management. While this is acknowledged, the FWS was still of the opinion that its concerns had not been addressed, and identified six areas where additional information was required.

The CAMPFIRE Association has taken these into consideration, especially the issues regarding "excessive retention of generated funds by Rural District Councils", and how much revenue elephant sport-hunting provides and how much of that comes from U.S. hunters. This document addresses part of the information requested by the FWS under "Revenue Utilization" to demonstrate that by allowing the importation of trophies taken by U.S. hunters, the survival of elephants in Zimbabwe would be enhanced. To support this position, the CAMPFIRE Association outlines the evolution of the CAMPFIRE Program, describing the extent of its coverage and the impact that it has had on wildlife conservation in Communal Areas of Zimbabwe.

Evidence from the 2014 national elephant survey is provided to show that Zimbabwe has a substantial elephant population that is managed sustainably through an adaptive quota setting mechanism. Data from 9 CAMPFIRE Districts that participated in this audit of CAMPFIRE revenue shows that approximately 60% of the allocated elephant quota is utilized and that the majority of hunters (53%) originate from America. These hunters have contributed US$9 million towards the CAMPFIRE Program during the period 2010-2015 compared to US$8 million by the 40 other nations.

The income generated from trophy fees in the last 6 years (2010 – 2015) is approximately US$11.4 million of which elephant trophy fees contributed 65%, while a further US$4 million has come from the sale of hides, concession fees and other sundry income. These funds have been distributed to CAMPFIRE communities in various Wards who received approximately 57% (range 39% - 77%) of the Trophy Fees.

A standardized tool designed to gather baseline data has provided information on the physical and human parameters of the 9 participating Districts including how and on what the revenues from hunting have been utilized. At the District level, approximately 80% of the funds are used to support the administration and management of the CAMPFIRE program, including investment on law enforcement. In contrast, 55% of revenues provided to the producer Wards are channeled towards supporting social services such schools, clinics and other programs that benefit the community.

The cost of living with wildlife, and particularly elephants, is shown through providing data on the scale of crop damage (7,000ha over 6 years) that has a significant impact in terms of its monetary value on rural communities who face food insecurity and deep poverty (average income US$1 a day). 96 human lives were lost to wildlife attacks, with elephant accounting for more than half of those deaths. Yet despite these challenges, communities still retain a high level of tolerance for elephants, but this support is rapidly dissipating as a result of the loss of income from trophy hunting. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime.

A way forward is discussed outlining how the resumption of trophy imports can offset the challenges facing the CAMPFIRE program and through this, enhance the conservation of elephant outside of the protected areas.

1 INTRODUCTION

In April 2014, the United States Fish and Wildlife Service (FWS) suspended the import of elephant trophies taken in Zimbabwe. The suspension was extended to include future hunting seasons on March 26, 2015. In May 2015, the Assistant Director (International Affairs) from the United States Fish and Wildlife Service (FWS), Mr. Byron Arroyo, wrote to the (then) Minister of Environment, Water and Climate outlining the reasons why the Service made a determination on 26th March 2015 that it was unable to authorize the import of elephant trophies taken in Zimbabwe in future. This is further explained in detail in the "Enhancement Findings for African Elephant Taken as Sport-hunted Trophies in Zimbabwe during 2014" published on the 7/22/14 (see reference FWS/AIA/DMA).

The FWS make the point that for it to authorize imports of sport-hunted African elephant trophies into the USA, the Service must be able to determine that the requirements of the special rule for the African elephant under the U.S. Endangered Species Act (ESA) have been met (see 50 CFR 17.40(e)(3)(iii)C). Specifically, the FWS must make a finding that the killing of the animal whose trophy is intended for import would enhance the survival of the species in the wild.

In defense of this, the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) provided the FWS with significant amounts of information and data related to elephant management. The FWS also communicated with various stakeholders including the Safari Operators Association of Zimbabwe (SOAZ), Zimbabwe Professional Hunters and Guides Association (ZPHGA), the CAMPFIRE Association, as well as individual professional hunters and outfitters, and independent scientific researchers.

The FWS acknowledged this input but still believed the data received did not fully address the questions regarding how elephants are managed in Zimbabwe, and how, by allowing the importation of trophies taken by U.S. hunters, that the survival of elephants in Zimbabwe would be enhanced. Six areas were identified where additional information was required. These are:

1: Updated Elephant Management Plan with formalized targets or indicators

2: Current elephant population data and the impact of hunting on the elephant population

3: Levels of poaching and prevention, including MIKE and PIKE data

4: Regulation and enforcement, particularly regarding the use of funds generated by U.S. hunters to support law enforcement and management

5: Sustainable use of elephant, specifically information of the levels of legal and illegal offtake

6: Revenue utilization from the hunting of elephant on Communal Lands, Safari Areas, Forestry and Private Conservancies.

The CAMPFIRE Association is not able to address these issues since these are the prerogative of the ZPWMA who is responsible for the conservation and management of elephant at the national level. Nonetheless, the CAMPFIRE Association is in a position to address part of the information requested under "Revenue Utilization", and contribute indirectly to the other five issues raised by the FWS.

2 Overview of Community Based Natural Resources Management in Zimbabwe

There are numerous reports and references in the literature that analyze the community based natural resources management program (CBNRM) in Zimbabwe. A more recent assessment can be found in the document prepared for USAID Zimbabwe by Mazambani and Dembetembe (2010).

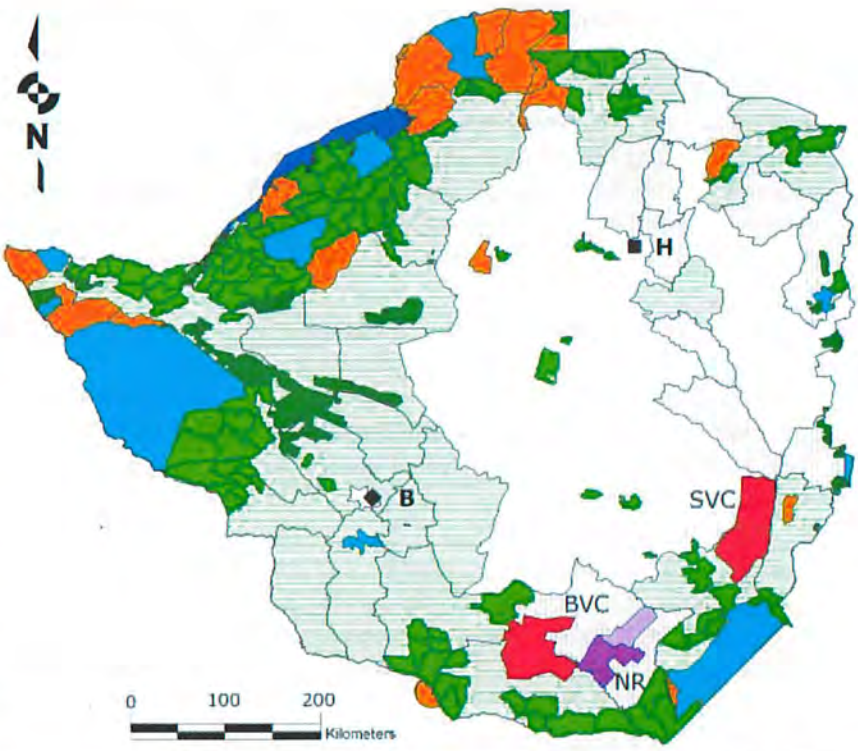

Figure 1: The location of CAMPFIRE areas (in light green) relative to National Parks (blue), Safari Areas (orange), Forest Areas (dark green) and Conservancies (red).

In 1982, the government amended the 1975 Parks and Wildlife Act to enable Rural District Councils (RDCs) to obtain 'appropriate authority' (AA) to utilize wildlife for commercial gain. The proposed changes were aimed at finding alternative forms of land use to subsistence agriculture on marginal lands. At that time, there was no particular model as to how this could happen without threatening the resource base. The (then) Department of National Parks and Wildlife Management (DNPWLM) began to explore options within the framework of an integrated landuse plan for the communal lands bordering National Parks and Safari Areas. This Act provided an opportunity to extend to communities in the Communal Lands the benefits that the private landowners enjoyed as a result of the 1975 Parks and Wild Life Act. This eventually led to the birth of Zimbabwe's Community Areas Management Program for Indigenous Resources (CAMPFIRE), which had far reaching impacts on wildlife productivity as well as the socio-economic wellbeing of CAMPFIRE communities.

2.1 The CAMPFIRE Program

The CAMPFIRE program was conceptually designed to focus on wildlife, woodlands, water, grazing resources, and grasslands. In practice, it focused on managing wildlife because of the direct monetary benefits which this resource offered to producer communities. The CAMPFIRE concept (see Murphree, 1993; Jones and Murphree, 2001) was developed in response to the realization that unless communities living adjacent to National Parks can obtain direct value from wildlife, they will not protect the wildlife. These communities would also need to have a much greater say in how those benefits would be derived and utilized.

While the 1982 amendment of the 1975 Parks and Wildlife Act permitted devolution of authority over wildlife to Rural District Councils (RDCs), the DNPWLM had meager resources to render the program operational (Jones and Murphree, 2001). The DNPWLM therefore turned to such institutions as the Center for Applied Social Sciences (CASS) at the University of Zimbabwe, which was assigned a socio-economic research and evaluation role; the WWF Multispecies Animal Production System Project in Zimbabwe; and the Zimbabwe Trust—an NGO focusing on rural development. These agencies had different but complementary objectives and together with the DNPWLM they formed the original CAMPFIRE Collaborative Group (CCG).

From 1986 to 1988, DNPWLM and its CCG partners engaged in discussions with selected communities and RDCs to identify locations for the inception of the program. The discussions focused on two main criteria, namely:

(a) voluntary interest in participation by communities and District Councils, and

(b) the presence of wildlife populations capable of producing sustainable and economically significant revenues.

The CCG work during this period also involved securing political support for the program, and attending to the demands of institutional and administrative detail associated with the conferment of Appropriate Authority (AA) by DNPWLM to RDCs, including the guidelines for awarding revenues and other benefits to communities from the the number of animals harvested within a local community's area each hunting season.

The agreed but non-binding guidelines stated that not less than 50% of the revenues was to be paid to the communities (as wards), not more than 35% was to be allocated to wildlife management (habitat management, fire control, monitoring, hiring of game scouts, etc.), and that 15% could be retained by the District Councils as an administrative levy.

Under the CCG, the CAMPFIRE Program attracted donor support and evolved through a number of phases.

- **Phase I** 1989-1994: (US$10m grant support – USAID and various partners). The period saw the initiation of CAMPFIRE and donor support was channelled towards the improvement of safari hunting in major districts that had been granted AA by 1995. This is also the period in which CAMPFIRE Association was established to coordinate the program.
- **Phase II** 1994-2003: (US$30m - USAID). This support focused on the capture of other natural resources (e.g. timber, sand, fishing, etc.). High-end non-consumptive tourism facilities were developed in Nyaminyami and Chipinge districts in the early 1990s, and 12 'joint venture' eco-tourism lodges were in operation in communal areas by 1999. Small grants were also provided to support the development of eco-tourism, crafts, and other community based natural resources management projects. Investments were also made in the production of natural resource products (e.g. fish in Beitbridge, Mwenezi; mopane worms in Bulilima Mangwe and Gwanda; honey in Binga, Kusile, Mutoko, and Nyanga districts) and many other products.
- **Phase III** 2003-2007: (US$165,000 – Ford Foundation). This period saw the cessation of major donor funding to CAMPFIRE, and it also coincided with larger macro level policy changes in

Zimbabwe after 2000, and the subsequent adverse socio-economic conditions. This led to the collapse of financial and technical support previously provided by the CCG.

- **Phase IV** 2007-present: (US$350,000 WK Kellogg Foundation). During this period, there was hyper-inflation, which led to the loss of income from hunting in real terms. This situation stabilised in 2009, when multiple foreign currencies were introduced. The CAMPFIRE Association maintained operations through a 4% levy paid by major hunting districts amounting to less than US$100,000 annually.

Following are key achievements in the development of CAMPFIRE (see Mazambani and Dembetembe, 2010):

I. Guruve and Nyaminyami, the first RDCs to be granted AA status, received their first hunting revenues in 1988. This had a dramatic effect in that many districts that are rich in wildlife applied for AA status and by the end of 1991 eleven additional districts had been granted AA status.

II. By the end of 1991, the 13 districts participating in the program collectively grossed US$1.1 million in revenue for that year.

III. By 1995 there were 23 districts participating in the program.

IV. The CAMPFIRE Association (CA), the secretariat for all districts with CAMPFIRE activities, was formed in 1992. Its primary objectives were to promote the wildlife interests of RDCs and to serve as an association of producer communities. The association played an important role in securing full government support for wildlife management in communal lands so that CAMPFIRE became a recognized conservation program.

V. Between 1995 and 2000 CAMPFIRE not only witnessed growth in terms of attracting more districts, but also in building the capacity of the RDCs, and in diversifying their activities to include other natural resources. The number of RDCs that were awarded AA status to manage wildlife increased from 2 in 1988 to 27 in 1996. Institutional capacity building grants via United States Agency for International Development (USAID) funding were secured for 24 districts from 1996 to 1999.

VI. Between 1989 and 2001, CAMPFIRE revenues amounted to almost USD $ 20.3 million, 97% of which originated in the original 13 districts. Of this, 49% was disbursed to communities (118 wards with over 121,500 households), 20% used for wildlife management, just over 12% retained by the District Councils as a levy, 3% used for other expenses (including the then 1.5% levy to the CAMPFIRE Association), and about 15% was retained by the RDCs pending allocation (Khumalo, 2003). Almost 90% of this income came from safari trophy hunting.

VII. The period from 2001 to 2003 witnessed two significant developments in CAMPFIRE:
   a. formation and registration of community trusts as a strategy for devolving decision making and control over resources from the RDCs to community groups, and
   b. a concerted drive to diversify CAMPFIRE. Twenty-eight non-wildlife-based community projects received financial support through CAMPFIRE compared to only five wildlife-based community projects.

VIII. At its peak in 2002, CAMPFIRE encompassed 53 districts with AA, though only 23 of these really functioned as intended, while only 12 received regular income from wildlife.

IX. The Association has spearheaded the revision of CAMPFIRE revenue sharing guidelines to improve the community's share of income from 50% to 55% of hunting income. A Direct Payment System was developed in 2006 to ensure that communities receive their income on

time. A standard hunting contract has been developed to improve hunting administration by RDCs.

In summary, CAMPFIRE protects about 50,000 km^2 (12.7%) of land in Zimbabwe (Figure 1). Benefits from wildlife and other incomes encompass:

- Approximately 777,000 households (25%) in Zimbabwe benefited from CAMPFIRE directly or indirectly;
- Approximately 25% of Zimbabwe's people are receiving incentives to conserve wildlife and prevent anti-poaching through CAMPFIRE;
- Between 1994 and 2012, CAMPFIRE generated US$39 million of which US$21.5 million was allocated to communities and used for resource management (22%), household benefits (26%), and community projects (52%).
- About 90% of CAMPFIRE revenue comes from hunting with elephant hunting contributing up to 70% of annual revenue.
- Based on Constitution of the CAMPFIRE Association as amended in 2007, all major RDCs use CAMPFIRE revenue sharing guidelines, and in these districts revenue is paid directly into community controlled bank accounts by safari operators using the following guideline:
  - RDC fees (41%), CAMPFIRE Association Levy (4%), and CAMPFIRE community (55%).

In the following sections, we describe how the income from the hunting of elephant is generated and utilized using data from 9 Districts (Beitbridge, Binga, Bulilima, Chipinge, Chiredzi, Hwange, Mbire, Nyaminyami, and Tsholotsho) for the period 2010 and 2015[1]. For each of these areas we provided:

- Total number of elephant hunted
- Total revenue earned from elephant (and other trophy species)
- How the revenue is spent on various management and social services

We also provide examples of community project support and the impact of human-wildlife conflict over this period.

3 Sustainable Use and Utilization of CAMPFIRE Resources and Revenues

The CAMPFIRE program relies almost exclusively on income from hunting. Since 2009, the number of RDCs where hunting is practiced has decreased, mostly because of the prevailing socio-economic conditions that have resulted in high levels of poverty. This is seen as the key driver of the escalating levels of illegal wildlife crime, and poaching of elephant in particular. Maintaining elephant numbers outside of the protected areas is important to their overall conservation, and the reason why Zimbabwe regards the sustainable utilization of all wildlife as critical to its national conservation strategy. The hunting of elephant in CAMPFIRE areas thus plays an important role and is the major source of income to communities in these areas.

[1] Hurungwe provided partial information, as explained in relevant parts of the report

3.1 Numbers, distribution and regional trends of elephant in Zimbabwe

Elephants are distributed in four main regional populations in Zimbabwe, namely, Northwest Matabeleland, the Sebungwe, the mid-Zambezi Valley, and the South-East Lowveld. Crude ecological densities vary between 2.16 elephant/km^2 in Northwest Matabeleland and 0.46 elephant/km^2 in the Sebungwe region.

Elephant densities in the Communal Areas varies from 1.50 elephant/km^2 in the south-east Lowveld to 0.06 elephant/km^2 in the Sebungwe region. Overall it is estimated that 5,000 elephants reside in Communal Areas and occupy approximately 16,000km^2 (Table 1, Zimbabwe Elephant Management Plan: 2015-2020).

Table 1. Numbers and densities of elephants in the four regions of elephant range within Zimbabwe. (Source: Zimbabwe National Elephant Management Plan 2015 - 2020, see Dunham *et. al.* 2015a, b, c and d).

Name of Region & Area	Area (km2)	Estimated Number of Elephants	Density of Elephants/km^2
NW Matabeleland	**24,989**	**53,991**	**2.16**
Hwange National Park	15,180	45,846	3.02
Matetsi Complex	4,402	4,843	1.10
Forest Areas	2,332	1, 101	0.47
Communal Lands	**3,075**	**2,201**	**0.72**
Sebungwe	**15,529**	**3,407**	**0.22**
Parks & Wildlife Estate	6,234	2,894	0.46
Forest Areas	261	16	0.06
Communal Lands	**9,034**	**497**	**0.06**
Mid-Zambezi Valley	**16,014**	**11,656**	**0.73**
Parks & Wildlife Estate	12,257	9,752	0.80
Communal Lands	**3,757**	**1,904**	**0.51**
South East Lowveld	**8,835**	**13,037**	**1.48**
Gonarezhou NP & Malapati SA	5,118	11,120	2.17
Save Conservancy	3,496	1,585	0.45
Communal Lands	**221**	**332**	**1.50**
Mozambique Border	*1,574*	*0*	*0*
National Total*	**65,367**	**82,091**	**1.23**
Parks & Wildlife Estate	43,191	74,455	1.75
Forest Areas	2,593	1,117	0.43
Save Conservancy	3,496	1,585	0.45
Communal Lands	**16,087**	**4,934**	**0.18**

* The survey did not include Bubye Valley Conservancy or the Tuli Safari Area and some other small populations that likely add another 1,000 elephants to the estimated total for the country. The area surveyed in Mozambique is not included in the national total or in the South-East Lowveld total area.

3.2 ELEPHANT QUOTA ALLOCATION AND UTILISATION

Zimbabwe is allocated an export quota of 500 elephants (1,000 tusks) in terms of the CITES regulations (see https://cites.org/eng/res/10/E-Res-10-10R16.pdf). In practice, Zimbabwe adopts an adaptive management strategy that sets the overall elephant quota at up to 0.75% of the overall population. This implies that the maximum national quota should not exceed 600 animals at the current population estimate of 80,000 elephants. However, to maintain trophy quality at approximately 35kg (77lbs), the national quota is set at 0.3 – 0.5% of the overall population i.e. 240 – 400 elephants, assuming an average offtake of 60% (R.B. Martin, pers. comm.).

The approach applied to the CAMPFIRE areas is to set quotas that use parameters that are higher than these national guidelines. This strategy is adopted to provide incentives to local communities that reside in areas where high levels of human-elephant conflict is recorded, and to facilitate benefits to local communities through sport hunting.

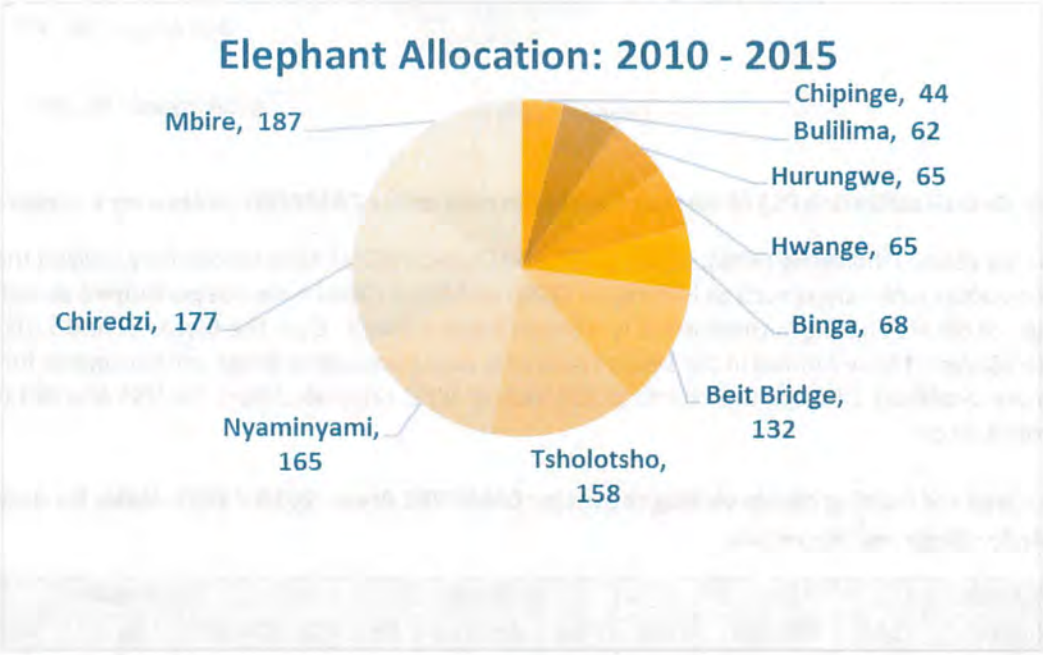

Figure 2: Total allocation of trophy elephant (N=1087) to nine major CAMPFIRE areas over a 6-year period

A total of 1,087 elephants have been allocated on quota to nine major CAMPFIRE areas since 2010 (Figure 2). This equates to 180 elephants per year. The distribution of this quota among the nine CAMPFIRE areas is dictated by the relative density of elephants in the neighboring protected areas and those residing in the CAMPFIRE areas. Tsholotsho, for example, that borders the southern boundary of Hwange National Park, was allocated 158 elephants (or 26/year) while Hwange, Binga and Hurungwe CAMPFIRE Areas that do not border onto areas of high elephant densities receive approximately 10 elephants/year.

The historical trend of utilization of the elephant quota (667 elephant or 61% of the quota allocation) is provided in Figure 3.

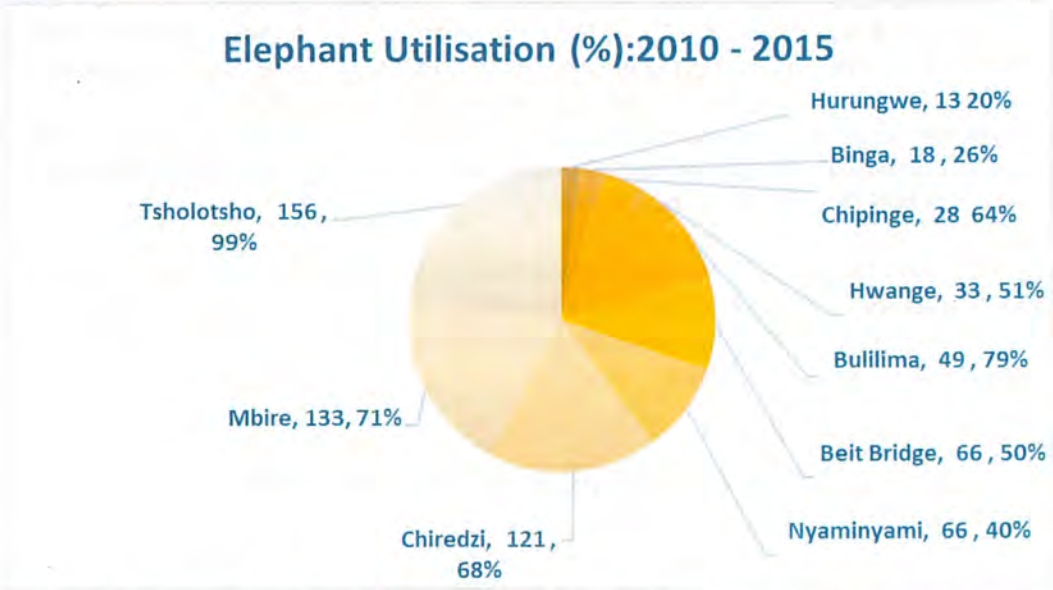

Figure 3: Overall utilization (%) of elephant quotas in nine major CAMPFIRE Areas over a 6-year period

Over the six years, Tsholotsho (99%), Mbire (71%) and Chiredzi (68%) have successfully utilized their allocated quotas while areas such as Hurungwe (20%) and Binga (26%) have not performed as well. The origin of clients hunting in these areas is summarized in Table 2. Over the 6-year period 1702 clients (average 284/year) have hunted in the seven CAMPFIRE Areas (excluding Binga and Hurungwe for which no data are available). Of these 897 clients (c.150/year or 53%) originated from the USA and 461 (c.77 or 27%) from Europe.

Table 2: Origin of hunting clients visiting the major CAMPFIRE Areas :2010 – 2015. Note. No data are available for Binga and Hurungwe

Origin of Clients	USA	Europe	Africa	Asia	South America	Oceania	Canada	Middle East	Total	Average
Beit Bridge	172	36	10	3	14	9	3	0	247	41
Bulilima	17	9	0	0	7	0	0	4	37	6
Chipinge	17	5	0	0	1	0	0	0	23	4
Chiredzi	151	52	57	69	0	0	0	0	329	55
Hwange	20	14	1	5	4	4	1	1	50	8
Mbire	213	90	36	0	10	16	3	0	368	61
Nyaminyami	273	218	24	1	18	21	8	0	563	94
Tsholotsho	34	37	3	4	1	1	1	4	85	14
Total	**897**	**461**	**131**	**82**	**55**	**51**	**16**	**9**	**1702**	**284**
Percentage	**53%**	**27%**	**8%**	**5%**	**3%**	**3%**	**0.9%**	**0.5%**		
Average/year	150	77	22	14	9	9	3	2		

3.3 Income Generation from Sport Hunting of Elephants and other Key Species

3.3.1 Income received by Outfitters

To fully account for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with all the relevant stakeholders, introduced 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 the information. In January 2015, a web-based system (TRAS2) was introduced which links Safari Operators, Zimbabwe Parks and Wildlife Management 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 (origin of clients, value of trophies and hunts, area hunted etc.), monitoring hunting quota utilization and tracking hunted trophies (Chitauro, 2016). 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 systems 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.

Outfitters that operate hunting concessions in CAMPFIRE Areas are required to deposit copies of the TRAS2 form with the CAMPFIRE Office in their respective RDCs/Wards. Each Office is therefore able to extract data on daily rates, trophy fees and other incidental revenues. Figure 4 provides a summary of the income by country of origin. This data confirms the major role of American hunters to the CAMPFIRE program who contribute 52% of the overall income.

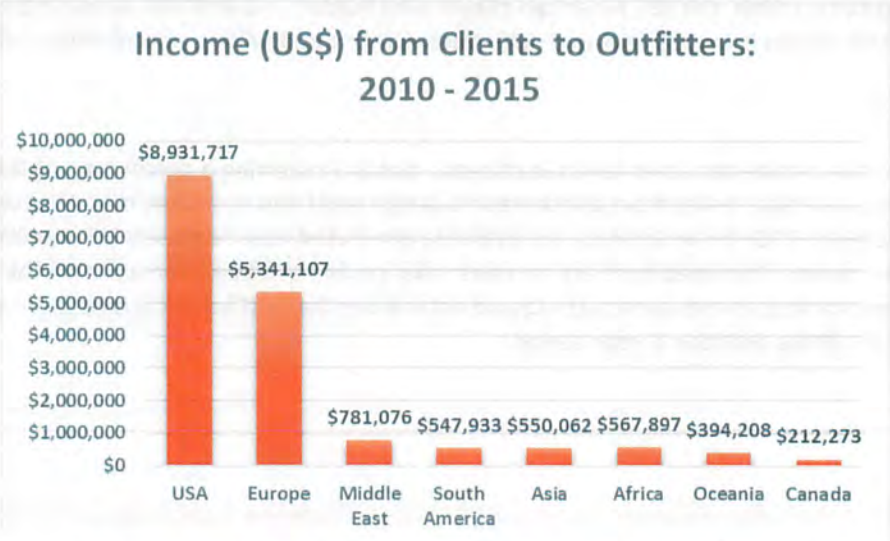

Figure 4: Contribution of hunting clients to the CAMPFIRE Program

3.3.2 Income from Trophy Fees

The data for the total amount of revenue generated for elephant, buffalo, leopard, hippo, crocodile and lion between 2010 – 2015 (approximately US$11 million) is shown in Figure 5.

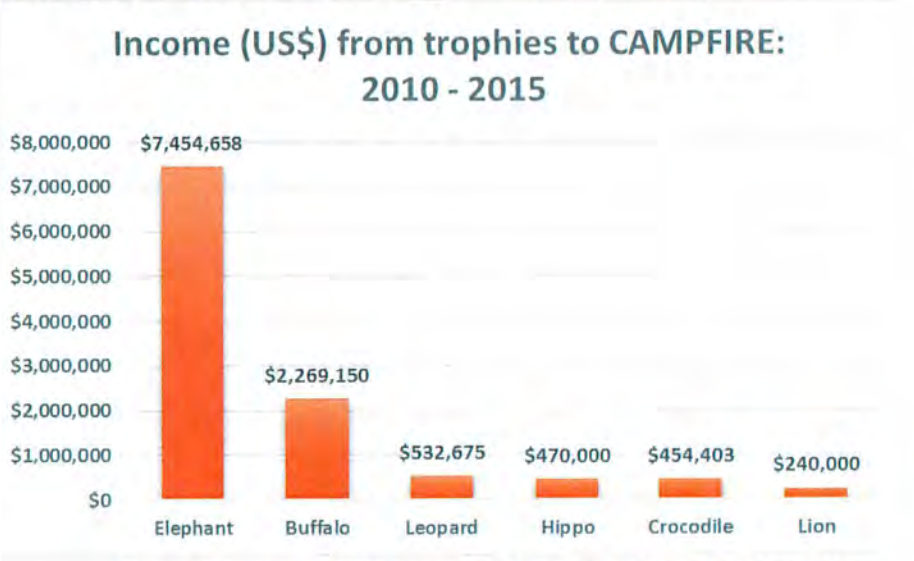

Figure 5: Income (US$) generated from the sale of key trophies

The importance of the income from elephant is clear from these data. Trophy fees from elephant account for 64% of all fees generated from the key species (approximately US$1.2 million/year). Buffalo (20%) are ranked second while leopard, hippo and crocodile contribute approximately 5% each. Noteworthy here is the low contribution of lion (approximately 2%). This low level of income generation is partly a result of the impact of the lion import suspension into the USA and Europe, decreasing quota allocations and decreasing offtake levels brought about by the recently imposed lion age hunting regulations. By comparison, the 897 American clients who hunted in CAMPFIRE Areas in the six-year period paid US$9 million in trophy fees and daily rates. Other nationalities, contributed US$8 million.

3.3.3 Other Income to RDCs

RDCs can generate income for other revenue streams, notably receiving a percentage of the daily rate, concession fees, bed night levies from photographic camps and from the lease/rent of equipment (Figure 6). The eight RDCs for which data are available generated approximately US$4 million from these revenue streams. Excluded here are revenues that could have been earned from the sale of ivory recovered from problem animal control (PAC) and natural deaths, and from the distribution of meat estimated at 550,000kg over the 6-year period.

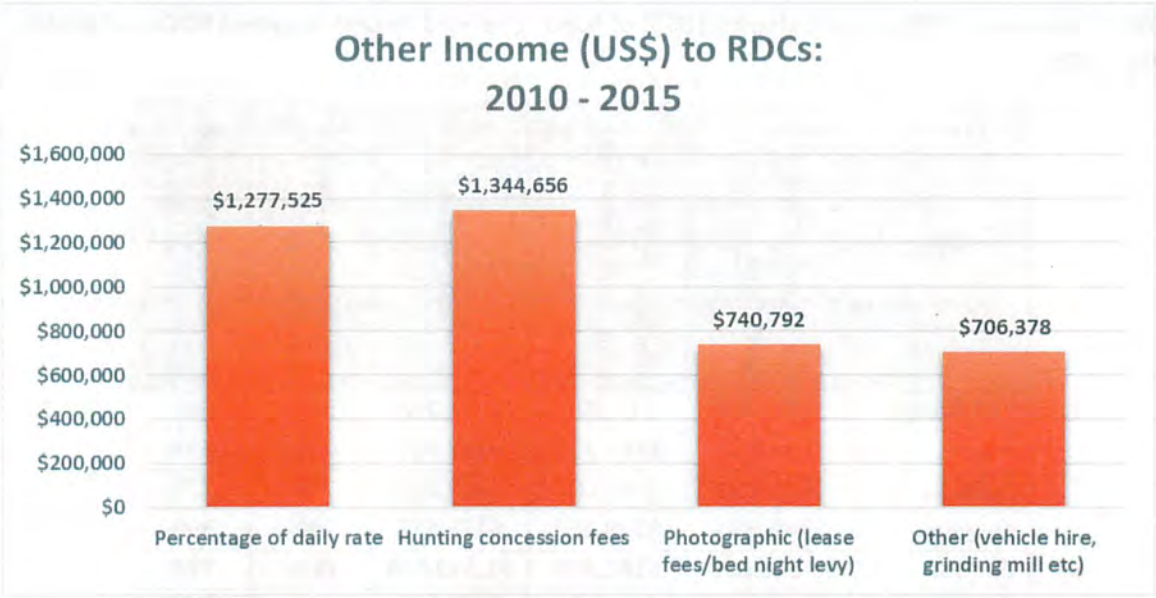

Figure 6: Income (US$) accruing to the RDCs from related income revenue streams

3.3.4 Benefit sharing: RDC vs Wards

Communities at the Ward level receive funds directly from the outfitter utilizing their area, except for those in Beitbridge and Hwange who are paid from dedicated CAMPFIRE accounts with the respective RDC. These funds are generated through trophy fees and income from the sale of hides, concession fees etc. (Table 3).

Over the last 6 years, the income generated from trophy fees is approximately US$11 million while a further US$4 million has come from the sale of hides, concession fees and other sundry income. The agreed split of these funds is that not less than 55% of the revenues is paid as Ward dividends, not more than 35% is allocated to the RDC for wildlife management (habitat management, fire control, monitoring, hiring of game scouts, etc.), and 15% is retained by the RDC as an administrative levy. Some RDCs do not consider all these revenues as "CAMPFIRE Funds" and segregate trophy fees from the other revenues. On average, the CAMPFIRE District Wards received 42% (range 23% - 66%) of the ***combined Concession and Trophy Fees***, but the Wards received approximately 58% (range 26% - 77%) of the ***Trophy Fees*** (Table 3).

Table 3: Summary of the benefit sharing (US$) of hunting related income between RDCs and Wards: 2010 - 2015

Districts	Income to RDC from trophy fees	Income to RDC from Hides, Concession fees etc.	Income to Wards	% All Revenue share: RDC vs Wards	% Trophy Fee Revenue share: RDC vs Wards
Beit Bridge	$657,458	$12,298	$370,228	55%	56%
Binga	$299,800	$364,224	$162,062	24%	54%
Bulilima	$521,700	$46,337	$403,685	71%	77%
Chipinge	$349,500	$139,259	$135,572	28%	39%
Chiredzi	$1,848,600	$181,420	$1,339,678	66%	72%
Hwange	$394,000	$105,131	$237,245	48%	60%
Mbire	$3,022,250	$54,420	$1,740,714	57%	58%
Nyaminyami	$1,883,853	$1,319,772	$1,132,204	35%	60%
Tsholotsho	$2,136,000	$1,990,200	$1,109,956	27%	52%
Total	**$11,420,886**	**$4,213,061**	**$6,631,342**	**42%**	**58%**

4 USE OF FUNDS BY RDCS AND WARDS

The CAMPFIRE Association prepared two templates in conjunction with district based CAMPFIRE Managers that were used as tools to audit the flow of income from safari hunting for the period 2010-2015, and how these funds are used to benefit CAMPFIRE communities. The tools gathered information on the following:

Tool 1: Data related to Rural District Councils

1. Area of district (either sq. km / ha) and total number of wards
2. The income generated by elephant, lion, leopard, hippo and crocodile i.e. Allocated quota (Number), Trophy fee, number hunted (offtake), percentage quota utilization.
3. The origin of the hunters (i.e. USA, Germany etc.) and the value of the safaris extracted from the TRAS2 forms where available. This data provided an indication of the income generation by outfitters.
4. The gross income that CAMPFIRE Districts received from the hunting and photographic activities (i.e. trophy fees, daily rates, concession fees, photographic fees, meat and any other sundry income).
5. Human resources employed at the District level (i.e. number of Wildlife Managers, number of Game Scouts, equipment (e.g., vehicles, patrol equipment etc.), patrol days per year.
6. The use of the funds to support:
    a. Meetings and Administration (i.e. the "15%" of funds)

   b. Law enforcement (RDC Game scouts, equipment, operational costs etc.)
   c. Compensation schemes (burial expenses, education, payment for hospital expenses etc.)
7. Management activities (fire guards, rehabilitation of water supplies, anti-poaching, problem animal control etc.)
8. Social services i.e. support to clinics, schools etc.
9. Other expenses not related to the above.

Tool 2: Data related to Wards

The following data was summarized for each ward in the District. The data collected at the Ward level was supported with evidence of income and expenditure e.g. copy of accounts, photographs of infrastructure etc.

1. Name of ward and ward number
2. Name and size of hunting area(s)
3. Name and number of village(s) and number of household beneficiaries
4. Income received at Ward level from hunting income, income generating projects from wildlife and other income (grinding mills etc.)
5. Allocation and use of income at Ward level for
   a. Meetings and Administration
   b. Wages/salaries
   c. Compensation schemes (e.g., burial expenses, education)
   d. Management activities (e.g., fire guards, rehabilitation of water supplies, anti-poaching, problem animal control.)
   e. Project running costs
   f. Social services (e.g. clinics, schools, grinding mills, roads, fencing, equipment, boreholes/pumps)
   g. Food security
   h. Direct cash benefits (i.e. to individuals, households, if applicable)
   i. Other
6. Human resources employed at the Ward level (i.e. number of Wildlife Managers, number of Game Scouts, equipment (e.g., vehicles, patrol equipment etc.), patrol days per year.
7. Number of Human and Wildlife Conflict cases by year and type (human death, injury, livestock, infrastructure)
8. Population estimates of major species (where available)

4.1 Profile of Rural District Councils

The data presented here has been extracted from Tool 1. For ease of understanding, these are presented below as follows:

- Characteristics of CAMPFIRE Districts
- Human resources and patrol effort
- Investment in equipment
- Expenditure

4.1.1 Characteristics of the CAMPFIRE Districts

The main parameters of the 10 RDCs (including Hurungwe) that provided data for this analysis are provided in Table 4. These RDCs represent approximately 9 million hectares of which 3.7 million hectares fall under the CAMPFIRE program. These RDCs have entered into agreements with both hunting and photographic outfitters who have invested in 26 hunting camps and 8 photographic camps respectively.

Altogether there are 224 Wards represented in these areas of which 104 are under the CAMPFIRE program. Excluding Hurungwe, there are 737 villages with a minimum of 85,847 households. This represents a community of approximately 600,000 people assuming that the average household is represented by 7 family members.

Table 4: Baseline features of the nine CAMPFIRE Districts

District	Total Area (Ha)	CAMPFIRE Area (Ha)	Hunting camps	Photo camps	Number of Wards	Number of Campfire Wards	Number of Villages	Number of Households
Beit Bridge	1,269,700	310,300	4	1	15	8	15	5,070
Binga	1,230,800	364,000	1	0	25	21	51	19,474
Bulilima	203,300	203,300	1	0	22	13	51	7,767
Chipinge	522,300	40,800	1	1	33	2	15	951
Chiredzi	1,710,239	481,004	5	0	32	9	52	9,461
Hurungwe	1,967,834	529,800	2	1	26	7	N/A	N/A
Hwange	376,963	376,963	2	1	20	18	93	13,980
Mbire	781,000	898,000	6	0	17	9	328	12,302
Nyaminyami	369,931	140,000	3	3	12	6	62	5,875
Tsholotsho	833,600	410,000	2	1	22	11	70	10,967
Total	**9,265,667**	**3,754,167**	**26**	**8**	**224**	**104**	**737**	**85,847**

4.1.2 Human resources and equipment employed at the District Level

Each of the RDCs employ staff to manage the CAMPFIRE program in their Districts. The number of people employed and the roles that they play is dependent on the level of income generated by the CAMPFIRE program. The core function of these staff is to monitor wildlife related activities in their respective areas, notably recording and dealing with human and wildlife conflict, coordinating meetings at the Ward level and monitoring outfitter hunting activities.

Most RDCs employ Game Scouts to conduct routine patrols and undertake basic law enforcement activities. In most cases this is low key since the CAMPFIRE program relies on members of the community to report incidents of wildlife crime, and any other matters related to wildlife in their respective Wards and villages.

Table 5: Summary of Human Resources Employed at District Level.

District	Wildlife Managers	Wildlife Officers	Game Scouts	Employees	Patrol Days
Beit Bridge	2	0	0	76	0
Binga	2	0	9	0	48
Bulilima	1	0	4	5	24
Chipinge	1	0	10	0	365
Chiredzi	2	0	8	8	91
Hurungwe	1	1	4	0	31
Hwange	1	0	6	0	144
Mbire	2	0	21	50	255
Nyaminyami	1	0	23	46	112
Tsholotsho	1	0	10	30	162
Total	**14**	**1**	**94**	**215**	**1231**

All RDCs have invested in various equipment that are employed on wildlife management activities. The number and type of equipment depends on the level of income and sophistication of the CAMPFIRE program. For example, the relatively wildlife endowed Mbire RDC has invested in a VHF radio system and camping gear for its scout force.

Table 6: Examples of equipment used in the CAMPFIRE Districts.

District	Vehicle (4 x 4, pick up etc.)	Truck	Tractor	Trailer	Grader/Tow Grader	Motor cycle	Bicycles	Radio Base Station	Radio hand sets	Rifles	Tents	Other
Beit Bridge	2	-	-	-	-	-	-	-	-	7	-	-
Binga	1	-	-	-	-	-	-	-	-	-	-	-
Bulilima	1	1	-	-	-	-	2	-	-	-	-	-
Chiredzi	2	-	1	1	1	-	-	-	-	-	-	-
Chipinge	1	-	-	-	-	-	-	-	-	7	-	-
Hurungwe	1	-	-	-	-	-	-	-	-	-	-	-
Hwange	1	-	-	-	-	3	-	-	-	7	1	-
Mbire	3	-	-	-	-	2	20	6	15	-	23	8
Nyaminyami	1	-	-	-	-	-	-	-	-	27	-	10
Tsholotsho	2	-	-	-	-	-	-	-	-	-	-	-
Total	**15**	**1**	**1**	**1**	**1**	**5**	**22**	**6**	**15**	**48**	**24**	**18**

4.1.3 RDC expenditure

CAMPFIRE related expenditure over the 6-year period is approximately US$6.2 million (or US$1.0 million/year). Figure 7 represents a breakdown of how the RDCs utilize the income from hunting to support the CAMPFIRE Program in their respective areas. These can be broken down into Administration, Management and Law Enforcement which accounts for approximately 80% of the expenses (or approximately US$835,000/year). The remaining 20% are used to support various community benefits and are aggregated under Social Services, Compensation and Other[2] activities. This equates to approximately US$220,000/year.

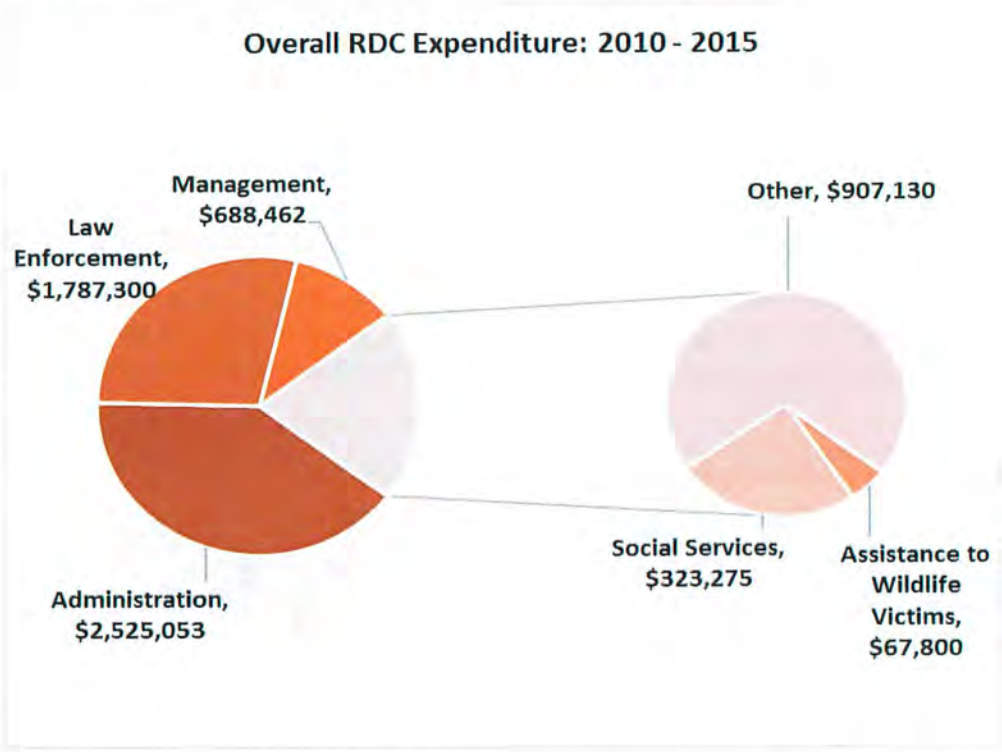

Figure 7: Breakdown of expenditure at the District level on CAMPFIRE program activities

A strategy employed by most RDCs is to invest more in activities related to the management and administration of the CAMPFIRE program rather than on social services. On average, 40% is spent on administration, 20% of law enforcement and 11% on management related expenses while 6% is allocated to support social services. There is no official national compensation scheme, however, RDCs and Wards (including outfitters) assist people and families who are injured or killed by wildlife.

4.2 Profile of CAMPFIRE Producer Wards

[2] The "Other" activities have been skewed by the inclusion of a number of expenses registered by Mbire RDC that include construction and maintenance of staff housing, promoting and managing a community cattle production scheme and purchasing vehicles and office equipment.

The data presented here has been extracted from Tool 2. For ease of understanding, these are presented below as follows:

- Human resources and patrol effort
- Human and Wildlife Conflict
- Investment in equipment
- Expenditure

4.2.1 Human Resources, Patrol Effort and Equipment

Table 7 represents the decision that the CAMPFIRE producer Wards elect to invest in their respective CAMPFIRE Programs. Each Ward is required to establish a Wildlife Committee to which at least 7 members are elected from the villages located in that ward. Each Wildlife Committee employs several people either as ward based monitors or as Game Scouts. This workforce is responsible for approximately 2.6 million hectares of land and represents the 85,847 households that reside in the 737 villages.

The decision to invest in equipment is dictated by the level of income that each producer Ward receives, and the ability of the Ward to service and maintain the equipment in the long term. The records kept at the Ward level under estimate the number of patrol days (minimum 3,002/year) achieved.

Table 7: Average number of staff employed at the Ward level, patrol effort and investment in equipment

District	Number of Wildlife Committee members	Number of Employees paid by community	Number of Game Scouts paid by community	Patrol days per year	Equipment (e.g., vehicles, tractors, grinding mills)	Concession Area (Ha)	Number of Villages	Number of Households
Beit Bridge	66	1	3	152	1	324,300	15	5,070
Binga	7	-	-	-	-	364,000	51	19,474
Bulilima	-	-	100	7	-	193,984	51	7,767
Chiredzi	56	32	-	-	3	N/A	52	9,461
Chipinge	9	5	5	1,584	4	9,400	15	951
Hwange	49	-	-	-	-	342,750	93	13,980
Mbire	76	90	48	1,259	19	898,000	328	12,302
Nyaminyami	45	30	12	-	-	140,000	62	5,875
Tsholotsho	77	2	-	-	1	410,000	70	10,967
Total	**385**	**161**	**168**	**3,002**	**28**	**2,682,434**	**737**	**85,847**

4.2.2 Human and Wildlife Conflict and Problem Animal Control

Communities living in CAMPFIRE areas are on the front line and are required to deal with wildlife problems almost on a daily basis. Table 8 below provides a summary of the magnitude of human and wildlife conflict (HWC) recorded over a 6-year period (2010 – 2015) in 9 CAMPFIRE Districts.

Conflict with wildlife falls under two areas: crop damage and livestock deaths. While there are many other wildlife species responsible for crop damage (baboons, monkeys, bushpig, rats, quelea birds etc.), elephant are considered the greatest threat and problem.

Although the data are incomplete, it is estimated that 7,000ha of crops were destroyed by elephant during the 6-year period under review. It is not possible to accurately place a monetary value to this because crop production varies greatly from one year to the next, and from one region to another. It is important however to take into consideration that the impact of crop destruction in the highly prone drought areas and areas of low rainfall (e.g. Beit Bridge, Binga, Tsholotsho) is more acute than in areas where crop production may be higher. To place this into perspective, the national average maize yield is estimated at 300 – 600kg/ha, and the minimum cash value is US$180/ton[3]. The approximate value of the maize lost is therefore US$500,000 – US$1.0 million. Applying this to livestock losses, the average price of cattle is US$400 – US$700/head depending on the time of year and condition of the livestock. Lion and crocodile are responsible for most cattle deaths and at these prices, the value of stock lost to these predators is US$500,000 – US$1.0 million. Hyena equally destroy cattle but are more likely to kill small livestock (goats, sheep). At US$75 – US$125/head, the minimum cost of predation on small livestock is estimated at US$170,000 – US$300,000 (Table 8).

Table 8: Summary of the extent of human – wildlife conflict recorded in CAMPFIRE Wards: 2010 - 2015

District	Crop Damage (estimated Ha)			Livestock killed (cattle, goats, sheep)				Human deaths
	Elephant	Hippo	Buffalo	Lion	Leopard	Crocodile	Hyena	
Beit Bridge	268	-	1	3	-	-	30	4
Binga	26	35	-	1	-	32	29	7
Bulilima	522	-	-	5	-	-	231	-
Chiredzi	18	9	-	122	-	21	-	2
Chipinge	22	10	-	5	-	7	-	7
Hwange	461	-	-	71	2	15	-	2
Mbire	3,878	475	1,146	426	52	416	1,870	53
Nyaminyami	1,216	49	102	59	6	9	-	13
Tsholotsho	1,085	-	20	175	19	-	211	8
Total	**7,495**	**578**	**1,269**	**867**	**79**	**500**	**2,371**	**96**
	9,342ha			**3,817**				
Cost (US$)	**@300kg/ha*$180/ton**		**$504,473**	**Cattle@$400 - $700/head**		**$546,800 - $1,040,400**		
	@600kg/ha*$180/ton		**$1,008,947**	**Small livestock@$75 - $125/head**		**$177,825 - $296,375**		

Communities who live with wildlife also pay the ultimate price and 96 people have lost their lives and others injured after encountering dangerous animals. Crocodile and hippo are responsible for most human deaths and injuries but there are many incidents where elephant have killed and maimed people who were tending their fields or traversing wildlife areas.

[3] Note: the official price for maize is approximately $350/ton but sellers rarely receive this price from the millers and other interested buyers.

Table 9 summarizes the incidents of problem animal control and illegal activities recorded in the 9 major CAMPFIRE RDCs (data extracted from The Proceedings of the CAMPFIRE workshop, Gandiwa et. al. 2014).

Table 9: Summary of problem elephant destroyed and through illegal activities in 9 CAMPFIRE Districts

	2009	2010	2011	2012	2013	2014	Total
Conflict	250	283	340	208	295	478	**1854**
PAC	55	66	41	33	36	66	**297**
Illegal	7	14	12	11	16	19	**79**

It is not unexpected that local communities will seek to mitigate these losses either through retaliatory killings (this applies mostly to the carnivores) or through removal of problem animals. With respect to elephant, it is important to understand the relationship between trophy hunting, problem animal control and illegal offtake. The interactions amongst all three variables are not simply additive. For example, a relatively small offtake of problem animals can have a significant influence on the mean tusk weight of hunting trophies taken from the population and, hence, the income derived from hunting. Martin (pers. comm.) uses a population simulation model (Craig et. al. 2011) to carry out an analysis to examine these interactions. This model assumes that Problem Animal Control (PAC) is selective, and that most of the elephants killed are males between the ages of 13-36 years old and females between the ages of 22-42 years old. Moreover, more males are killed than females (5:1).

Martin demonstrates that the combined effect of trophy hunting quotas and level of PAC shows that in a scenario where there is no PAC, trophy hunting quotas can be set ranging from 0.1 - 0.6 % of the population. However, as PAC increases, so the trophy hunting quotas must be decreased to maintain trophy quality. The magnitude of the changes caused by relatively minor increments in PAC are highly significant. The modelling shows that increases in the trophy hunting quotas and PAC offtake causes only a minor drop in the rate of increase of the population which remains above 4% per annum, however, if the PAC offtake exceeds 1% of the population, then hunting quotas should not exceed 0.1% of the population. Unless these ratios are maintained, there is a real risk that the elephant populations will decline with the consequential loss of income from sport hunting.

Currently Zimbabwe adheres to quotas set at 0.3 – 0.4% of the population, and slightly higher in the CAMPFIRE areas. The PAC levels shown in Table 9 do not approach these critical thresholds, however, close attention needs to be paid to trophy quality and age (see discussion of elephant hunting in Mbire - in The Proceedings of the CAMPFIRE workshop, Gandiwa et. al. 2014).

4.2.3 Beneficiaries of CAMPFIRE Income at the Ward Level

The beneficiaries of revenues from the CAMPFIRE program are the community's resident in the producer Wards. However, the volume of people residing in these areas precludes providing individuals with direct dividends since the value of such dividends would be meaningless. The CAMPFIRE wards have therefore elected to invest in projects that provide social services to the whole community and only in special circumstances are dividends paid out for food security and direct cash benefits.

Table 10: Examples of Social Services funded in selected CAMPFIRE areas from Ward Revenues generated from sport hunting: 2010-15

District	Project
Beitbridge	Rehabilitation of schools, clinics and protection of irrigation schemes
Bililima	Rehabilitation of 3 clinics and 3 primary schools, hall, fencing of fields and rehabilitation of lodge, community truck, tractor, dam repair machinery.
Chipinge	3 grinding mills, lorry, teachers houses, community office, shop
Chiredzi	Clinic, teachers' houses, primary school, community-grinding mill, Police sub-office, piped water and electrification of clinic.
Hurungwe	Construction of classroom block Nyamakate Secondary, Maintenance of Nyamakate bridge. Purchase of tractor tube, payment of carpenters, Roofing Chipfuko Primary School and Huyo Secondary School, CAMPFIRE Ward tractor major service, Purchase of Treasurers bicycle, Payment of Nyamakate Clinic guard, 7 resource monitors allowances, 26 bag cement Chitindiva, Kabidza , Manyenyedzi and Mawau schools for toilets construction, renovation Karuru School (5 bags cement), and toilet construction, Chitindiva Clinic toilet construction, Roofing Chikova Secondary School, Purchase of buiding materials Chikova Secondary Block, Painting Dete Primary School, Building toilets Makwiye school, Building shed Mupuse school, Roofing Bhashungwe primary school, Sanyati Bridge camp renovation, Purchase of Cement Tashinga Primary School, 6 pairs uniform for resource monitors, Purchase of 20 bags cement Chisipite Primary School, Purchase of tires for Ward tractor, Bridge maintenance
Mbire	Clinic, nurse's houses, office, storerooms, 14 classrooms, 7 teachers houses, grinding mill, school office, wildlife administration offices, 2 hand pump boreholes, water piping, toilet, water storage tanks, 2 tractors, a basic tourist camp with 4 chalets;
Nyaminyami	Tillage tractors, renovation of dispensary at clinic, nurse's house. Construction of Mayovhe classroom block, 3 grinding mills, Teacher's house, Jongola school. School bursaries x 3 students at Seke Teacher's College. Renovation of pre-schools x 2. Negande: Rehabilitation of water pipeline, grinding mill. Nebiri: Chikuro primary block, rehabilitation of Harudziva water pipeline. Kasvisva: Rehabilitation of water pipeline to supply water to Kasvisva clinic, Kasvisva Secondary school block. Msampa: Teacher's house, Majazu primary, renovation of ward warehouse; Kanyati: Cement for teacher's house renovation.
Tsholotsho	Classroom blocks and furniture (Sihazela, Mlevu, Mtshwayeli, Ntulula, Dibutibu, Gwaai, Nkwizhi, Zibalongwe, Malindi, Mgodimasili, Phelela, Mpilo, Jimila, and Kapane Primary schools), 2 F14 cottages, 10 sewing machines (Dibutibu Secondary school), 7km piped water system for Thembile primary school, Sikente Clinic, Tshitatshawa and Jowa clinics construction, fencing of Madlangombe clinic, 10 water engines, borehole drilling and repairs and repair kits, Lister diesel engines for 6 villages in ward 21 and at Sihazela Line in ward 1, grinding mills, solar water pumping in wards 1, 2 and 4. 2 pickup trucks for wildlife monitoring purchased in 2015.

Figure 8 summaries the distribution of the US$5.4 million that Wards in 9 CAMPFIRE areas received over the 6-year period under review (2010 – 2015). As with the District expenditure, the Ward Wildlife Committees allocate 42% of the funds (US$2.2 million) for administrative functions (i.e. Meetings and Administration, Wages and Salaries, Management and Projects) and 55% of the funds (US$2.9 million) to

community benefits. Most of the funds are allocated to social services (US$2.4 million) that support schools, clinics and other infrastructure that benefit the whole community. Examples of this support are provided in Annex 1.

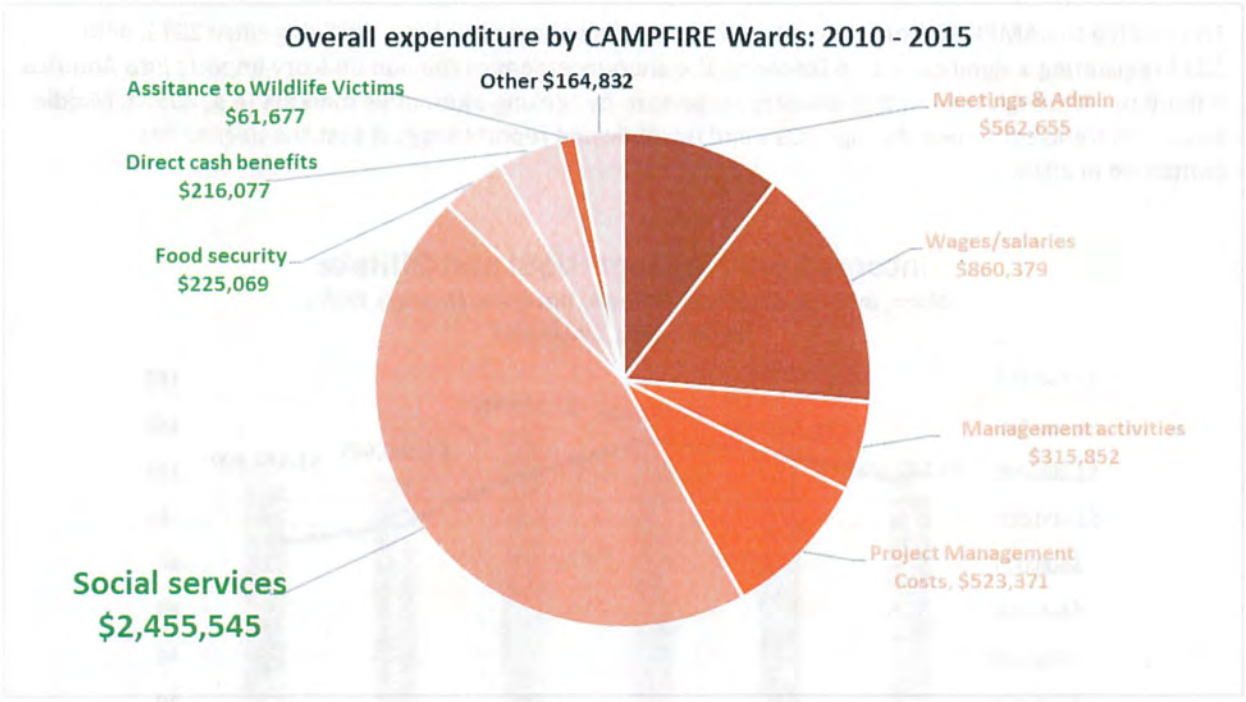

Figure 8: Allocation of Ward Campfire funds

5 Impact of the Suspension of Elephant Trophy Imports to the United States on the CAMPFIRE Program

The income to CAMPFIRE from the sustainable use of elephants has been declining since 2013, with 2014 registering a significant drop following the announcement of the ban on ivory imports into America (Figure 9). Although the hunting industry responded by seeking alternative markets (e.g. Russia, Middle East), this trend continued through 2015 and unconfirmed reports suggest that the decline has continued in 2016.

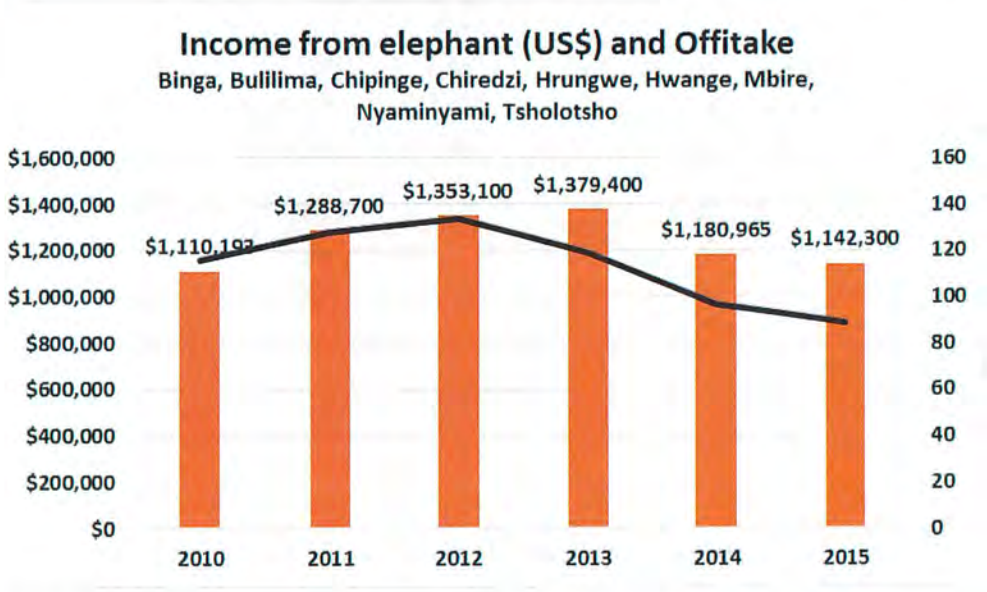

Figure 9: Annual income (US$) and offtake of elephants in 10 CAMPFIRE Districts

It is difficult to show concisely how the American ban on importation of elephant ivory from Zimbabwe has contributed to the decline in CAMPFIRE revenue and how hunting has enhanced the conservation of this species, due to the nature of the hunting industry in the CAMPFIRE areas. The hunting sector is integrated across a wide range of socio-economic activities and withdrawing one segment adversely affects a range of other wildlife based activities. Several indicators are provided here to demonstrate this:

1. The US suspension of ivory imports from Zimbabwe has had a significant impact on CAMPFIRE, and resulted in the cancellation of 108 out of 189 (57%) elephant hunts in all major districts initially booked by US citizens in 2014. The net impact of this was a reduction of CAMPFIRE income for all areas from US$2.2m in 2013 to US$1.7m in 2014. A similar pattern prevailed in 2015 (US$1.6m), and a further decline is anticipated in 2016 where outfitters struggled to sell elephant safaris and those that did had to heavily discount their prices.
2. The key trophy species (elephant, buffalo, leopard, hippo, crocodile and lion) contribute approximately US$1.2 million/year to CAMPFIRE revenues. Elephant account for 64% of these fees.

3. Quota utilisation of elephant prior to the ban did not exceed 60% of the CAMPFIRE quota allocation.
4. American hunters make up 53% of the clients in CAMPFIRE areas.
5. CAMPFIRE producer Wards receive on average 57% of all trophy revenues.
6. The CAMPFIRE hunting industry in the 9 RDCs covered in this analysis directly supports 104 producer Wards, representing 737 villages or 85,847 households.
7. The CAMPFIRE program employs managers, officers and game scouts at both the District and Ward level who are responsible for monitoring wildlife based land use activities in their areas and these are directly paid from safari hunting income.
8. Both RDCs and Wards invest in a variety of equipment that benefits communities and wildlife management. The operational and maintenance costs for this equipment are drawn from safari hunting income.
9. RDCs utilise 80% of the CAMPFIRE revenues to support administration and management of the program. 20% is invested in global social services that benefit communities at the District level.
10. Producer Wards, representing approximately 2.6 million hectares, bear the cost of living with wildlife. Under the 6-year period under review, elephants are responsible for the destruction of approximately 7,000ha of croplands in the 9 Districts. The minimum cost of this in terms of food production is estimated at US$500,000 – US$1.0 million.
11. Producer Wards have elected to invest 55% of their dividends from CAMPFIRE revenues in social services (schools, clinics etc.). 74% of these revenues are generated through trophy fees where elephant play a significant role.
12. Although CAMPFIRE communities suffer most from elephant crop damage, the number of elephant destroyed as problem animals is well within acceptable limits and with few exceptions, has little or no impact on population numbers.

In conclusion, the CAMPFIRE program relies almost exclusively on revenues generated through hunting. These revenues cannot be replaced through alternative wildlife based activities. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime.

Wildlife in Communal Lands is under pressure. Removing any benefits will tip the balance and disgruntled CAMPFIRE communities will turn to pastoralism and unsustainable agricultural practices, thereby reducing wildlife habitat. The suspension of trophy imports is effectively encouraging communities to become willing tools for poaching – a forced abandonment of CAMPFIRE.

6 The Way Forward

The ZPWMA has recently developed and approved its 5-year Elephant Management Plan (ZPWMA, 2015). This plan recognizes that if elephants are to survive in the future, they must have a value, both to the governing authorities and to the local people. Unless the local communities, who live closest to elephants, are tolerant of this charismatic yet destructive species, it is unlikely that they will survive in the long term.

The Elephant Management Plan recognizes that "*regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole. Wildlife can be a most valuable asset and in turn empower local communities and provide basic necessities. When it is viewed as a valuable asset, wildlife becomes an economically competitive land use in Zimbabwe, which leads to habitat preservation instead of habitat destruction and conversion to agriculture or livestock production.*"

The presence of regulated hunting can also reduce illegal activities, and private outfitters' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Trophy hunting revenues are vital to facilitating not only law enforcement activities but also general wildlife management. Alternative wildlife land use practices, e.g. eco-tourism, cannot generate sufficient revenues to cover these costs, and certainly not to justify wildlife as a land use outside of protected areas.

Hunting can generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities.

CAMPFIRE has been widely regarded as one of Africa's most successful contemporary conservation initiatives. Hunting of elephants plays an integral part in promoting CAMPFIRE as it permits the residents of communal lands to share in the benefits generated by wildlife utilization on those lands.

As shown above, the bulk of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 60% of annual revenue. The current revenue sharing guidelines require safari outfitters to pay revenue directly into community-controlled bank accounts and this has had a positive impact on community attitudes to wildlife conservation. These funds have been used by RDCs and producer Wards to promote wildlife conservation, but despite its achievements, CAMPFIRE still faces fundamental challenges.

The most crucial of these challenges is developing strategies to accommodate the increasing human populations averaging 16-20 people per km^2 in some key CAMPFIRE areas. Understandably, the focus of these households is on food security requiring the extension of basic agricultural schemes and increased livestock numbers. Such land uses are incompatible with wildlife based land use.

Other CAMPFIRE challenges include: (i) the downturn in Zimbabwe's economy and tourism sector post-2000, (ii) great reliance on consumptive trophy hunting and less focus on other uses and non-consumptive uses of natural resources due to viability considerations, and (iii) low re-investment in development, fixed assets, human capital, and management and protection of wildlife in CAMPFIRE areas.

Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and an evaluation dedicated to improving the program is ongoing and should be finalized by the end of 2017. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this program.

The hunting of elephants, under sustainable and well-regulated conditions, has the potential to raise adequate funds to support itself and other species in CAMPFIRE areas. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in its Elephant Management Plan, and recognizes the role that elephant play in the CAMPFIRE program.

7 ANNEX 1: EXAMPLES OF SOCIAL SERVICES PROJECTS SUPPORTED BY CAMPFIRE FUNDS AT THE DISTRICT AND WARD LEVEL

CHINONGE WARD Binga District: Clinic under construction and example of Ward bank statement.

Results 1 - 11 of 11

Account Statement
Account : 103000008919 Currency : USD
Customer : 174696 Name : CHINONGE WARD CAMPFIRE FUND
Address 1 CHINONGE WARD CAMPFIRE FUND
Address 2 CHINONGE WARD CAMPFIRE FUND
Address 3 BOX 23 BINGA

Value date	Description	Reference	Post date	Debit	Credit	Amount
	Balance at Period Start				3,030.45	3,001.15
16 SEP 14	Cash Withdrawal Charge 06011533Z06 NEVER NDLOVU	TT14259HDYZH	16 SEP 14	-29.30		71.15
16 SEP 14	Cash Withdrawal 06011533Z06 NEVER NDLOVU	TT14259HDYZH	16 SEP 14	-2,930.00		58.65
01 OCT 14	Ledger Fees	103000008919-2014093	30 SEP 14	-12.50		56.65
01 OCT 14	Service Fees 103000008919	103000008919.SERVICE	30 SEP 14	-2.00		44.15
01 NOV 14	Ledger Fees	103000008919-2014103	31 OCT 14	-12.50		42.15
01 NOV 14	Service Fees 103000008919	103000008919.SERVICE	31 OCT 14	-2.00		2,842.15
10 NOV 14	TRANSFER LODZI HUNTERS	FT143140JG30\TRE	10 NOV 14		2,800.00	42.15
10 NOV 14	TRANSFER	FT143150JG40\TRE	11 NOV 14	-2,800.00		2,842.15
10 NOV 14	TRANSFER LODZI HUNTERS	FT143150JG41\TRE	11 NOV 14		2,800.00	2,829.65
01 DEC 14	Ledger Fees	103000008919-2014113	29 NOV 14	-12.50		2,827.65
01 DEC 14	Service Fees 103000008919	103000008919.SERVICE	29 NOV 14	-2.00		
	Balance at Period End				2,827.65	

16 DEC 2014

Beit Bridge CAMPFIRE Program: Masera Secondary School Classroom Block and Staff Housing

Tsholotsho RDC: CAMPFIRE Vehicles, Tshitatshawa Clinic under construction in Ward 8, Tsholotsho CAMPFIRE District Wildlife Committee, Hunting Camp, and solar powered 7km piped water scheme

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Aerial Survey of Elephants and other Large Herbivores in Gonarezhou National Park and Save Valley Conservancy (Zimbabwe): 2014

K.M. Dunham & H.F. van der Westhuizen

March 2015

Publisher
Harare, Zimbabwe

This survey was conducted in partnership with the Zimbabwe Parks and Wildlife Management Authority

The opinions expressed in this report are those of the authors and do not necessarily represent those of the Zimbabwe Parks and Wildlife Management Authority, The Great Elephant Census, Paul G. Allen, or Frankfurt Zoological Society.

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GREAT ELEPHANT CENSUS
A PAUL G. ALLEN PROJECT

FRANKFURT ZOOLOGICAL SOCIETY

Discussion

Elephants

There were estimated to be 11120 (+/- 2753) elephants in Gonarezhou NP during 2015. This is the greatest ever estimate for the number of elephants in this park. Taken with the results of the earlier aerial surveys, this estimate implies that the number of elephants in Gonarezhou NP has increased at a mean annual rate of 6.0 % (lower and upper confidence limits 4.5 % and 7.5 %) during the past 19 years.

Elephant Carcasses

No fresh or recent carcasses of elephants (i.e. age categories 1 or 2) were seen in Gonarezhou NP during 2014. Consequently, the 1+2 carcass ratio was zero. This compares with 0.39 % during 2013 and 0.28 % during 2001 (Figs 4 and 5).

The estimated number of all elephant carcasses increased from 167 during 2001 to 511 during 2014. The all-carcass ratio increased from 3.3 % during 2001 to 4.2 % during 2013 and 4.4 % during 2014. If it is assumed that all unidentified carcasses were in fact elephant carcasses, the all-carcass ratio becomes 6.6 % during 2014, which compares with 7.6 % during 2001. Taken together, these numbers suggest that much of the increase in the number of dead elephants since 2001 can be accounted for the large increase in the number of live elephants during the same period. In other words, the more live elephants there are, the more that are likely to die, even when only deaths from natural causes are considered.

Other Large Herbivores

The trend analysis confirmed the results of earlier analyses, namely that the numbers of all large herbivores in Gonarezhou NP (except sable and ostrich) have increased since the 1992 drought.

Encroachment on Gonarezhou NP

Cattle – presumably from Mozambique – were seen outside the search strips west of the international border in the Chefu stratum.

Coincident with the occupation of Zimbabwean commercial farms during 2000, the Chitsa people illegally occupied land in the north of Gonarezhou NP. Their action stemmed from dissatisfaction dating from when they (or their ancestors) were removed from the area of the current national park when the land that they then occupied was incorporated into a hunting area, established possibly as part of a programme to control tsetse flies and trypanosomiasis. Between the 2009 and 2013 surveys, a game fence has been erected to separate the area occupied by the Chitsa community (Stratum Chitsa S) from the remainder of the park. All sightings of domestic livestock in the north of the park during the 2014 survey were northwards of this fence, or in the vicinity of the Save River northwards of its confluence with the Runde River. It seems likely that there is a discrepancy here between official maps (followed when drawing the stratum boundaries) and the local people as to where the park boundary lies.

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Map 5. Strata used during the 2014 aerial survey of South-East Lowveld

Bold lines indicate stratum boundaries and labels give stratum names.

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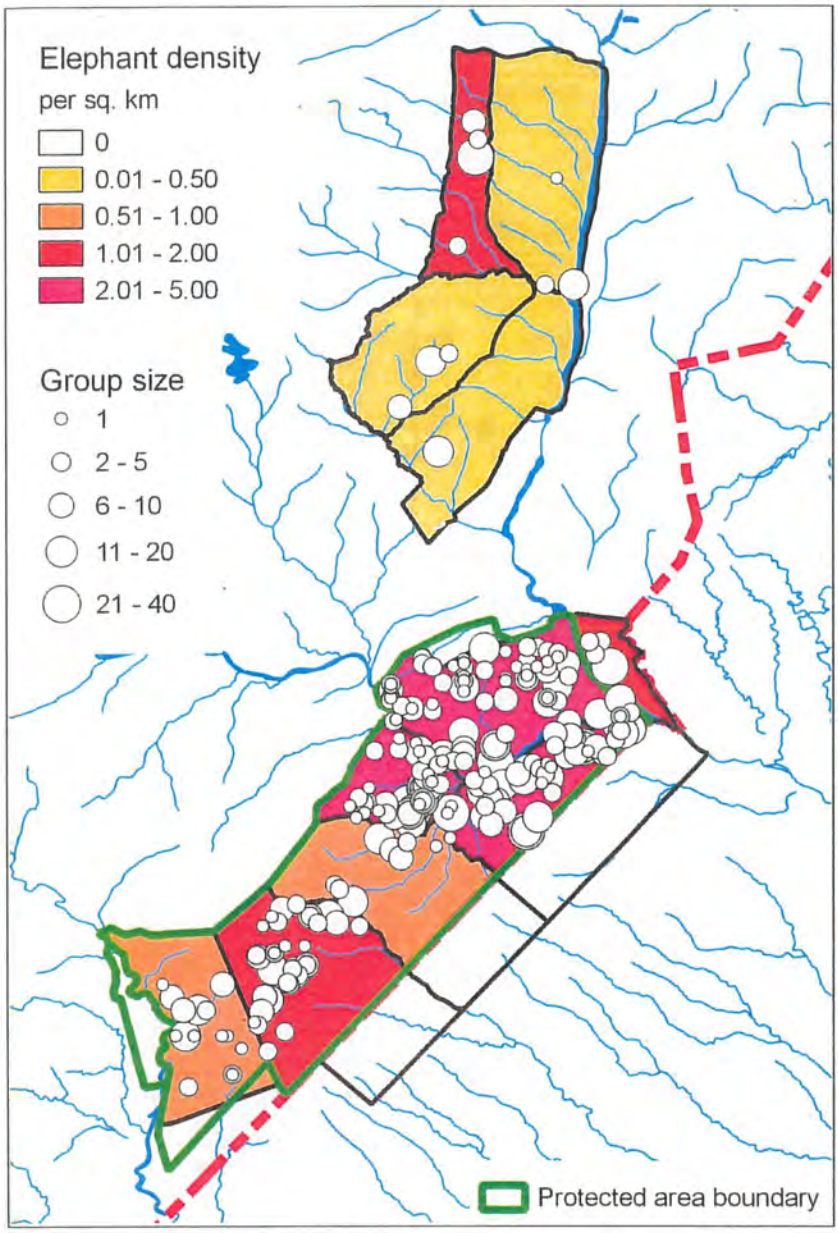

Map 7. Distribution of elephant in Gonarezhou NP and SVC during 2014

Colouring indicates the mean density of elephants within each stratum. The dots indicate the locations of elephants seen *within the search strips*, together with an indication of the size of each group. Small dots overlaying large dots indicate two or more groups of elephants in close proximity. Variation in dot density between strata reflects differences between strata in *both* the density of elephant groups *and* the sampling intensity (given in Table 6). The red dashed line indicate the international border.

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NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted African 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 the attorney, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: (b) (6) [redacted]

Name: THOMAS M. LAMELLE

Date: 7/9/2018

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
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July 26, 2018

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike, Falls Church, Virginia 22041

RE: Application for Permit to Import Sport-Hunted Elephant Trophy, Thomas Lavelle

Dear Chief Cogliano:

Enclosed please find one application for a permit to import a sport-hunted elephant trophy from the Chiponda Pools concession, Zimbabwe. This is a CAMPFIRE communal area on the border of Gonarezhou National Park. The elephant population has increased to a record, excessive high, and the hunting incentivizes community tolerance for, and willingness to protect, this growing population. As stated in the attached email from the hunting operator, no elephant has been poached on this concession. We have included additional enhancement information in the DMA's files submitted by Conservation Force and Zimbabwe's Parks and Wildlife Management Authority, in making a positive enhancement finding for the applicant.

Please do not hesitate to contact us if you have questions about this application or need further information.

Sincerely,

John J. Jackson III

Encl:

- Authorization of Representation
- Lavelle import permit application and supporting documents
- CAMPFIRE Association, "Role of Trophy hunting" report
- Excerpt from the *Aerial Survey of Elephants and other Large Herbivores in Gonarezhou National Park and Save Valley Conservancy (Zimbabwe)*; 2014

3240 S 1-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: *(504)* 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

Brisendine, Amy <amy_brisendine@fws.gov>

Re: [EXTERNAL] RE: Elephant Withdrawal Inquiry

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Wed, Oct 2, 2019 at 11:31 AM
To: THOMAS LAVELLE <(b) (6) "Cogliano, Mary" <mary_cogliano@fws.gov>
Bcc: amy_brisendine@fws.gov

Thomas,

I am forwarding your response to Dr. Coliano so she is aware of your concern and can address the issue with you.

Thank you,

Tim Mac Donald

Government Information Specialist
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 Wed, Oct 2, 2019 at 11:26 AM THOMAS LAVELLE (b) (6) > wrote:

> I have delayed the hunt 3 mes w aing f or your office to respond at a cost of over $15,000. I have made numerous inquiries to FWS I have contacted Jorge Villanicio who informed me that Dr. Cogliano had taken over my request. I have made nine a empts to contact Dr. Cogliano and cannot not even get the courtesy of a response, this had been going on for over 14 months.
>
> I am sure you are all busy but at least you could give me the courtesy of a response.
>
> I am sll w aing.
>
> Sincerely
>
> Thomas Lavelle
>
> **From:** MacDonald, Tim [mailto:tim_macdonald@fws.gov]
> **Sent:** Wednesday, October 02, 2019 10:05 AM
> (b) (6) ; permits@conservationforce.com
> **Subject:** Elephant Withdrawal Inquiry

Thomas,

U.S. Fish and Wildlife Service Prt #02666D

On 08/14/2018 an applica on for the importa on of an African Elephant, sport hunted trophy was received by this office **Prt #** 02666D . At the me of the applica on's submission the hunt was to be held at a future date.

Please confirm at this me if you successfully hunted the elephant. If **yes**, please state so, and provide the date and loca on the elephant was taken.

If **no**, do wish to withdraw your applica on at this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific loca on, and date. Permit applica ons and fees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applica on.*

Thank you,

Tim Mac Donald

Government Information Specialist

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

Brisendine, Amy <amy_brisendine@fws.gov>

Status of 02666D African elephant sport-hunted trophy import from Zimbabwe

1 message

Brisendine, Amy <amy_brisendine@fws.gov> Wed, Oct 2, 2019 at 12:21 PM
To: (b) (6) m
Cc: Amy Brisendine <amy_brisendine@fws.gov>, "Emma C. Sampson" <permits@conservationforce.org>

Hi Mr. Lavelle,

I apologize for the delay in processing your application. I am copying, per your application, Ms. Emma Sampson, at Conservation Force.

Your application, dated June 26, 2018, received in our office on August 14, 2018, to import one male sport-hunted African elephant trophy from Zimbabwe (scheduled hunt originally in February 2019 with Cliff Walker Safaris, location Chiponda Pools, Gonarezhou National Park, has been assigned to me to review.

Please note that since March 1, 2018, in response to a D.C. Circuit Court opinion, the Service informed the public that we were revising our procedures for assessing applications to import certain sport-hunted species (memo link here - https://www.fws.gov/international/pdf/memo-withdrawal-of-certain-findings-ESA-listed-species-sport-hunted-trophies.pdf).

The Service withdrew its countrywide enhancement findings for a range of species, including African elephant and bontebok. In their place, the Service is now making findings for trophy imports on an application-by-application basis. The Department of the Interior recognizes that well-managed hunting programs can contribute to the conservation of the hunted species. Therefore, the Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of these sport-hunted species, including African elephants) and we evaluate the information provided in the application as well as other information available to the Service regarding the status and management of the species to ensure that the hunting program is promoting the conservation of the species. Each application must also meet all other applicable permitting requirements before it may be authorized. The Department is fully aligned with the Administration and the law on this matter.

With that said, based on reviewing your application, it looks like the two pieces of information remaining are your CITES export permit from Zimbabwe and the hunting license. When you receive these two documents, please forward copies to me.

I hope you enjoy your hunting trip to Zimbabwe, and please let me know when you return if you successfully hunt an elephant.

Please feel free to contact me directly if you would like to discuss your application.

Thank you and again, my apologies for the delay.

Amy Brisendine, Biologist
U.S. Fish and Wildlife Service
International Affairs, Division of Management Authority
5275 Leesburg Pike, 2nd floor, MS: IA; 2W059D
Falls Church, Virginia 22041
703-358-2005 direct

https://www.fws.gov/international/permits/
https://www.cites.org

On Wed, Oct 2, 2019 at 11:26 AM THOMAS LAVELLE <(b) (6) wrote:
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I am sure you are all busy but at least you could give me the courtesy of a response.
I am still waiting.

Sincerely

Thomas Lavelle

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Sent: Wednesday, October 02, 2019 10:05 AM
To: (b) (6); permits@conservationforce.com
Subject: Elephant Withdrawal Inquiry

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Please confirm at this time if you successfully hunted the elephant. If yes, please state so, and provide the date and location the elephant was taken.

If no, do wish to withdraw your application at this time?

Please confirm the current status.

***Please note the permit that was applied for was for a specific location, and date. Permit applications and fees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new application.

Thank you,
Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

Re: [EXTERNAL] RE: Elephant Withdrawal Inquiry

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Wed, Oct 2, 2019 at 11:31 AM
To: THOMAS LAVELLE (b) (6) com>, "Cogliano, Mary" <mary_cogliano@fws.gov>
Bcc: "Brisendine, Amy" <amy_brisendine@fws.gov>

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Thank you,

Tim Mac Donald

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> **Subject:** Elephant Withdrawal Inquiry

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Tim Mac Donald

Government Information Specialist

Division of Management Authority

Branch of Permits; MS: IA

US Fish and Wildlife Service

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Falls Church, VA 22041-3805

(w) 703-358-2256

(F) 703-358-2280

Brisendine, Amy <amy_brisendine@fws.gov>

[EXTERNAL] RE: Status of 02666D African elephant sport-hunted trophy import from Zimbabwe

1 message

THOMAS LAVELLE (b) (6) m> Fri, Oct 4, 2019 at 1:45 PM
To: "Brisendine, Amy" <amy_brisendine@fws.gov>

Amy I have been delaying the hunt waing f or a reply from FWS that is the reason for not providing export permit and hunng license c onservaon F orce is no longer represenng me so ther e is no need to copy them on correspondence.

Thank you for someone finally contacng me.

Tom Lavelle

From: Brisendine, Amy [mailto:amy_brisendine@fws.gov]
Sent: Wednesday, October 02, 2019 11:21 AM
To: (b) (6)
Cc: Amy Brisendine <amy_brisendine@fws.gov>; Emma C. Sampson <permits@conservationforce.org>
Subject: Status of 02666D African elephant sport-hunted trophy import from Zimbabwe

Hi Mr. Lavelle,

I apologize for the delay in processing your application. I am copying, per your application, Ms. Emma Sampson, at Conservation Force.

Your application, dated June 26, 2018, received in our office on August 14, 2018, to import one male sport-hunted African elephant trophy from Zimbabwe (scheduled hunt originally in February 2019 with Cliff Walker Safaris, location Chiponda Pools, Gonarezhou National Park, has been assigned to me to review.

Please note that since March 1, 2018, in response to a D.C. Circuit Court opinion, the Service informed the public that we were revising our procedures for assessing applications to import certain sport-hunted species (memo link here - https://www.fws.gov/international/pdf/memo-withdrawal-of-certain-findings-ESA-listed-species-sport-hunted-trophies.pdf).

The Service withdrew its countrywide enhancement findings for a range of species, including African elephant and bontebok. In their place, the Service is now making findings for trophy imports on an application-by-application basis. The Department of the Interior recognizes that well-managed hunting programs can contribute to the conservation of the hunted species. Therefore, the Service is continuing to monitor the status and management of these species in their range countries. We review each application received for the import of these sport-hunted species, including African

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 2015

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
EDWARDS	THOMAS	S	JR
(b) (6)	4. Affiliation/ Doing business as (see instructions) N/A		
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
N/A	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 JACKSONVILLE	1.c. State FL	1.d. Zip code/Postal code 32207	1.e. County/Province DUVAL	1.f. Country USA
2.a. Mailing address (if different than physical address in 1.a. above) (b) (6)				
2.b. City JACKSONVILLE	2.c. State FL	2.d. Zip code/Postal code 32202	2.e. County/Province DUVAL	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 ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the ...ement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

...opied or stamped signatures) Date of signature (mm/dd/yyyy) 8/30/2016

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; Katima Mulilo District; Bwabwata National Park East; near the village of Kongola; GPS Coordinate: S17°44.408' E023°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 - lifesize 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:	Ndumo Safaris Ltd.
Address:	Karl Stumpfe/Frederick Bezuidenhout
City:	P.O. Box 1667
State/Province:	
Country, Postal Code:	Ngweze, 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 signatu (b) (6) 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):

Tim Bo
(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.

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.

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No. 1018-0093
Expires 05/31/2017

FEB 7 2018

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Edwards	Thomas	S.	Jr.

(b) (6) [redacted]

5. Affiliation/ Doing business as (see instructions): N/A

(b) (6) [redacted]

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	N/A

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
N/A	N/A

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
N/A	N/A	N/A	N/A

5. Principal officer title	6. Primary contact name
N/A	N/A

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
N/A	N/A	N/A	N/A

C. All applicants complete address information

(b) (6) [redacted] tment #, Suite #, or Room #; no P.O. Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Jacksonville	FL	32207	Duval	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Jacksonville	FL	32207	Duval	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA10499C-0 17US10500C/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the [redacted] tement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

[redacted] it (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy): 1/30/18

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 MA10499C-0 ~~17US10500C/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. N/A
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal. ATTACHED

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: N/A Date: N/A

   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: (b) (6) Date: 1/30/18

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.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email): James L. Boone

(b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Renewal Application Addendum
Permittee: Thomas S. Edwards, Jr.
Permit #: MA10499C-0
Permit #: 17US10500C/9

In response to the requirements of Section E, 3b, a successful elephant and leopard hunt was conducted and the trophies iare still being prepped by the Namibian taxidermist. They have indicated the shipment will not be ready prior to the expiration date of the existing permits.

Renewal Application Addendum
Permittee: Thomas S. Edwards, Jr.
Permit #: MA10499C-0
Permit #: 17US10500C/9

In response to the requirements of Section E, 6b, my mailing address has changed from:

(b) (6)

to:

(b) (6)

(b) (6)

Thomas S. Edwards (b) (6)

Date 1/30/18

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA10499C-0

Effective: 03/13/2017 Expires: 03/12/2018

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:

THOMAS S. EDWARDS JR
(b) (6)
JACKSONVILLE, FL 32207
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. Trophy must have been taken during the 2017 hunting season.

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. Valid for use by permittee named above.

E. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

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. Specimen may not be sold or transferred for any financial remuneration.

I. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II expot permit issued by the Management Authority of Nambia.

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
17US10500C/9

2. Valid
03/12/2018

3. Permittee (name and address, country)
THOMAS S. EDWARDS JR
(b) (6)
JACKSONVILLE, FL 32207
U.S.A.

4. Consignor (name and address, country)
NDUMO SAFARIS LTD.
KARL STUMPFE/ FREDRICK BEZUIDENHOUT
P.O. BOX 1667
NGWEZE
NAMIBIA

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.

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

U.S. CITES Management Authority

03/13/2017
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 / 11. Quantity (including units) / 12. Country of Origin
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 NAMIBIA
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

600663

RCVD DEC 13 2016
OMB No. 1018-0164
Expires 11/30/2016

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Brant	Alexis	Alexander	N/A

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)		N/A	

5.a. Telephone number	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)
N/A	N/A

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
N/A	N/A

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
N/A	N/A	N/A	

5. Principal officer title	6. Primary contact name
N/A	N/A

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
N/A	N/A	N/A	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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Mullibrook	New York	12545	USA	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
N/A

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
N/A	N/A	N/A	N/A	N/A

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: (Lion) MA98397B-0 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) — 12-9-14
Signature of applicant (or person responsible for permits (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: 0 (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: 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: 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).
      2 Tusks, 2 ears, 1 foot

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: Botswana, Matsebe Camp, Hunting block NG29, near Maun

   b. Date wildlife was hunted:
      7/09/08

Copy of Hunting lic.

SIXTH SCHEDULE

reg. 8(1)

Licence No.

Rev 630 (Revised 2000)

REPUBLIC OF BOTSWANA

000390988A

WILDLIFE CONSERVATION AND NATIONAL PARKS ACT

No. 28 of 1992

SINGLE GAME LICENCE

In terms of section 28 of the Wildlife Conservation and National Parks Act licence is hereby granted to

Alexis A Bratt

(b) (6)

Passport /Omang/ (b) (6) Hunting Card No. NG/MA/NR/08/BM/1480

to hunt ONE animal of the following species Elephant in area NG29

from 22/04/08 to 16/09/08

Signature of Holder (b) (6) Date: 22/4/08

For Official Use Only:

Head/Subhead/Item:	72/202/01
CITIZEN FEE PAID:	(Amount to be written in words)
NON-CITIZEN FEE PAID: P0 000-00	Twenty thousand pula

Name of Licensing Officer (Print)

Signature of Licensing Officer I.D. of Licensing officer: 4112846

Date: 22/04/2008

DEPARTMENT OF WILDLIFE & NATIONAL PARKS LICENCING OFFICE 2008 -04- 22 P.O. BOX 11 MAUN BOTSWANA. TEL: 686 1368

This licence is not valid unless there is an official DWNP stamp in red ink on top of the Licensing Officer's sinature and a valid CITA permit

REGISTER

(The licence holder must complete the shaded section)

Species	Area	Sex	Date of killing or wounding	Signature
ELEPHANT	NG29	MALE	07/09/08	

The holder shall complete this register when the animal is killed and BEFORE it is moved or dismembered or, when the animal is wounded, as soon as the pursuit of the wounded animal is abandoned. IT IS AN OFFENCE NOT TO SO COMPLETE THIS REGISTER (Section 38 WCNPA)

along this perforation)

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, 1 foot (umbrella stand)

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 157 Gauteng
Nooitgedacht South Africa
Muldersdrift 1747

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:	Trans African Taxidermists
Address:	Plot 157
Address:	Nooitgedacht
City:	Muldersdrift 1747
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: 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: N/A _____ 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.

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: X (b) (6) Date: 12-9-16

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):

Same Address as in

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):

Alex Brant as provided in Applicant information

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.

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA14673C-0

Effective: 01/30/2017 Expires: 01/29/2018

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:

ALEXIS ALEXANDER BRANT
(b) (6)
MULLIBROOK, NY 12545
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. 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.

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 male African elephant (*Loxodonta africana*), taken in Botswana 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 2008 Botswana hunting season.**

I. 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 South Africa.

RCVD DEC 27 2017 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
BRANT	ALEXIS	ALEXANDER	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4 d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
MILLBROOK	NY	12545	DUTCHESS	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 ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA14673C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applicable parts in subchapter B of ***Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature of person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 12/17/2017

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 MA146736-0
would like to extend for a year, please
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 signatur[redacted] Date: Dec 17, 2017

   Note: You misspelled Bangall Road and Millsoods on permit.

   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): ALEX BRANT
(b) (6) [redacted] Dec 29- JAN 2 ONLY)
(b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☐ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

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: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Estes	Aldredge		

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Midland	Texas	79701	Midland	

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) _____ 12/13/16
ble 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.

      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 signatu(b) (6) _____ Date: 12/11/16

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):
aldredge (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.

ELEPHANT IMPORT FROM NAMIBIA

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 79701
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

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name 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.	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 MIDLAND	1.c. State TX	1.d. Zip code/Postal code 79701	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?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA17865C-0 No ☐

3. ve read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the nderstand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

erson 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: (b) (6) Date: 3/16/18

   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, 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 (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ELEPHANT IMPORT FROM NAMIBIA

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 Coglianese
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

ALDREDGE ESTES
(b) (6)
MIDLAND, TX 79701
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 I 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, ALDREDGE ESTES III (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 79701 having an office and place of business at (b) (6) MIDLAND TEXAS 79701 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 thr Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, steed 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 merchandize shipped or cosigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandize; to receive any merchandize 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 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 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 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 (b) (6)

IN WITNESS WHERE OF, the said (Print name) ALDREDGE ESTES (b) (6)
has caused these presents to be sealed and signed:

(Signature) (b) (6)

(Capacity) SALE **(Date)** 1/23/18

WITNESS (b) (6)

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 (b) (6) [redacted]

MAIL: Genus Logistics 76 Albany Blvd Atlantic Beach NY 11509

FAX: 516 400 9787

ESTES (b) (6) [redacted] ALDRENGE

Last Name First Name MI

(b) (6) [redacted] USA (b) (6) [redacted]

Passport # Country of issue Date of Birth

(b) (6) [redacted] MIDLAND TX 79701

Physical Address (*Required) City State Zip

(b) (6) [redacted] MIDLAND TX 79701

Zip

(b) (6) [redacted]

Work Phone Cell Home Phone

/ (b) (6) [redacted]

Fax E-Mail

DELIVERY INFO:

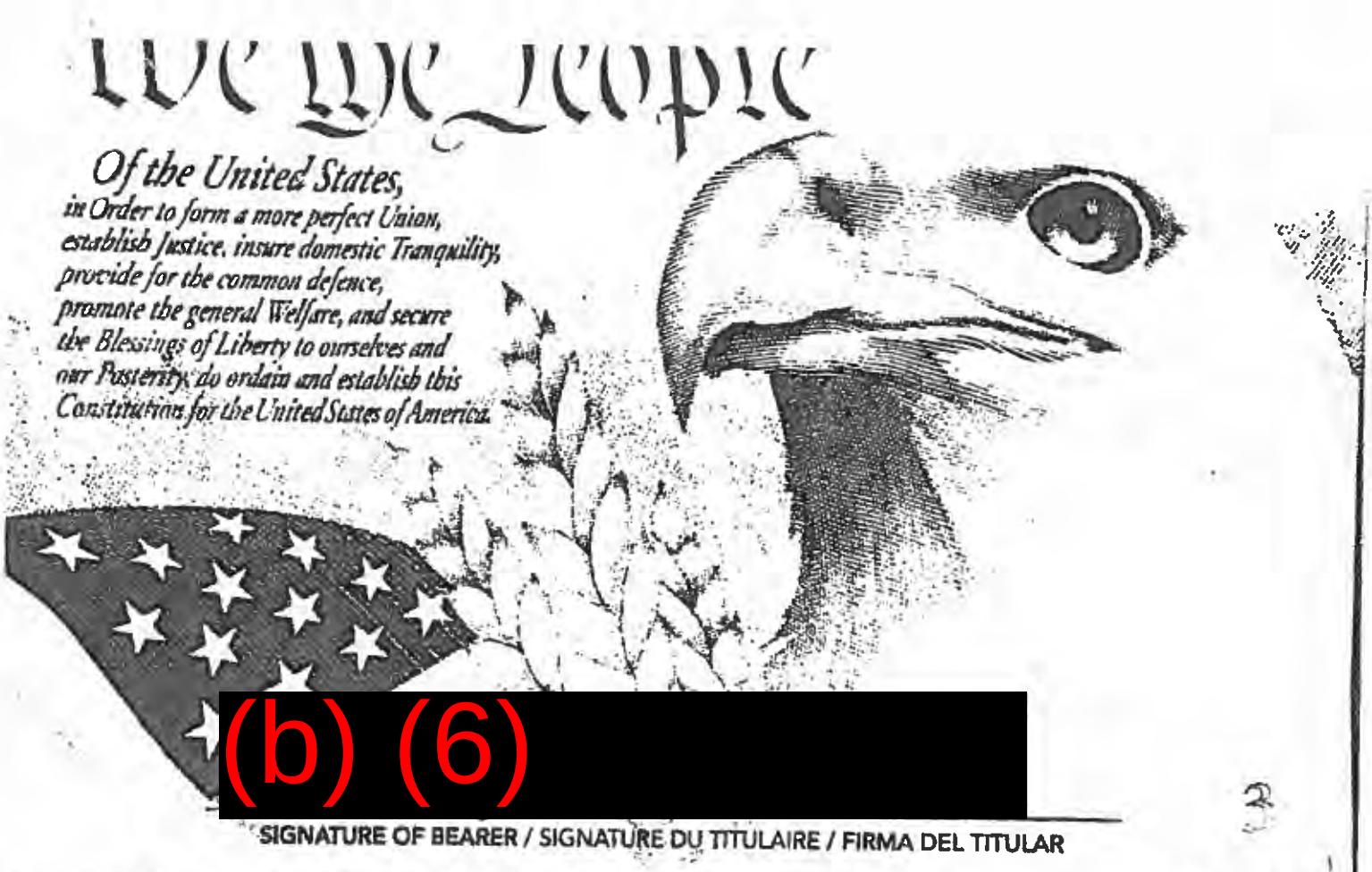
Taxidermist / Tannery or Yourself (If business c/o business name)

(b) (6) [redacted] MIDLAND TX 79701

Physical Address (No P.O. BOX) City State Zip

(b) (6) [redacted]

Delivery Contact: Phone Liftgate Required? ✓ Yes



(b) (6)

SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR

PASSPORT
PASSEPORT
PASAPORTE

UNITED STATES OF AMERICA

Type / Type / Tipo P

Code / Código USA

Passport No. / No. du Passeport / No. del Pasaporte (b) (6)

USA

(b) (6)

Surname / Nom / Apellidos
ESTES III

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
(b)(6)

(b) (6)

d'expiration / Fecha de caducidad
(b)(6)

Endorsements / Mentions Spéciales / Anotaciones
SEE PAGE 27

United States
Department of State

USA

P<USAESTES<III<<ALDREDGE<<<<<<<<<<<<<<<<<<<<<<

Macleantown • East London District • 5280
P.O. Box 18143 • Quigney • 5211
Tel: +27 (0) 43 742 9000 • Fax: +27 (0) 43 742 9001
Email: mpongo@premierhotels.co.za

w w w . m p o n g o . c o m

FEB 2 8 2017

mpongo PRIVATE GAME RESERVE

21 February 2017

LETTER OF MOTIVATION

To whom it may concern

Proposed hunting of an elephant bull on Mpongo Private Game Reserve

Mpongo Private Game Reserve is managed at a very high level on all fronts, including correct management of all its plentiful wildlife. Mpongo Reserve is currently building up its elephant population, having started with a small nucleus of re – introduced animals. The original bull that arrived with this group will in the very near future, have the undesired effect of breeding with his offspring. Part of the funds acquired from the hunting of this bull will go towards obtaining a new bull of unrelated bloodline. This is essential to the wellbeing of our growing heard of wild elephant.

Mpongo Reserve also prides itself on the staff that it employs from the local communities that live adjacent to the reserve. Total employees 65
This employment is essential to the employee's families, as they are the main breadwinners. They receive ongoing training, and are doing very well in their respective forms of employment.
The remaining part of the funds obtained by the hunting of this elephant will go to uplifting and empowering these dedicated staff members and their families.

Please contact me or Mike Bunge for any other information.

Kind Regards

Martin Jansen van Rensburg
General Manager

For Section "E" 15"

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

FEB 2 8 2017

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Bemis	Craig	Alan	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Tucson	AZ	85715	Pima	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
Same as above; Contact Person Craig Bemis

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: Don't remember (from 2009) No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of 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)

02/22/2017

Signature of 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.

      Loxodonta africana, African bush elephant - 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:

      Mpongo Game Reserve, Eastern Cape Province, nearest city - East London, South Africa
      COORDINATES: SOUTH 32° 50' 36.0"
      EAST 72° 43' 57.5"

   b. Date wildlife is to be hunted:
      07/01/2017 - 08/02/2017

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      2 Ears, 2 Tusks, 2 front feet, Panels of skin and the tail.

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:	Kevin Boucher (owner) Hunters & Collectors Taxidermy
Business Name:	19 Produce Street Baakens River Valley
Address:	Port Elizabeth Eastern Cape South Africa
Address:	Postal Address:
City:	P.O. Box 15675
State/Province:	Emerald Hill, 6011
Country, Postal Code:	Port Elizabeth Eastern Cape South Africa

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if ap[redacted]t raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: [redacted] 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).

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):

Return Envelope Inclosed

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):

Craig Bemis, (b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA24155C-0

Effective: 04/25/2017 Expires: 04/24/2018

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:

CRAIG ALAN BEMIS
(b) (6) [redacted]
TUCSON, AZ 85715
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 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. 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 South Africa.

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).

(b) (6)
(b) (6)
Tucson, Arizona 85751

RCVD FEB 14 2018

Feb 8, 2018

To: Dept. of the Interior U.S. Fish & Wildlife Service

Re: Reissuance, Renewal of permit # MA24155C-0

Please find enclosed a check for $100.00, my original Cites Permit for an elephant from South Africa and the appropriate Permit Application Form for reissuance of an existing permit. My hunt was successful and the trophies are being processed at this time. However the processing will not be completed within the time frame of the original permit. I would therefore appreciate it if the permit could be reissued / renewed in order for me to import my trophies.

If needed my contact information is as follows:

Physical address (where the trophies will be shipped:

(b) (6) Tucson AZ 85715

Mailing address:

(b) (6) Tucson AZ 85751

Email: (b) (6)

Mobil phone (b) (6)

Thank you for your help in this.

Regards,

(b) (6)

Craig A. Bemis

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA24155C-0

Effective: 04/25/2017 Expires: 04/24/2018

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:

CRAIG ALAN BEMIS
(b) (6) [redacted]
TUCSON, AZ 85715
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 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. 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 South Africa.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

LB

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity: RCVD FEB 14 2018
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Bemis	Craig	A	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6) [redacted]			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Tucson	AZ	85715	Pima	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
Craig Bemis (b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Tucson	AZ	85751-1687	Pima	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA24155C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other *app* ***Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the bes t any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]

Sig sible for permit (No photocopied or stamped signatures) 01/02/2018 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 MA24155C-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: (b) (6) Date: 01/02/2018

   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):

Craig Bemis, (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

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: Russell Jeter

Date: 3-20-2017

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

RCVD APR 05 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Jeter	Russell		

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		N/A

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. (b) (6) Boxes)

1.b. City	1.c. State	1.d. Zip code/Postal code.	1.e. County/Province	1.f. Country
Anacortes	WA	98221	Skagit	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Anacortes	WA	98221	Skagit	USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: Unavailable No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the be[illegible]d that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 3-20-2017

Signature of applicant or 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:_____(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:

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: Tanzania Burunge Wildlife Management Area
   b. Date wildlife was hunted: March 28th, 2013
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): EARS, Leg skin, Tail
      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]:
      Game Frontiers Office Dar Es Salaam

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	Game Frontiers of Tanzania Ltd.
Name: Address:	P.O. Box 19746
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.

ease refer to the positive enhancement and non-detriment findings for import of sport-
nted elephant trophies from Tanzania in 2013.

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: (b) (6) Date: 3-20-2017

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 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.

ORIGINAL

10519

THE UNITED REPUBLIC OF TANZANIA

MINISTRY OF NATURAL RESOURCES AND TOURISM

March 13, 2013 3:27:57 pm

IN.# 1001339

APP: 1000650

GAME HUNTING PERMIT

RETURN DATE: Friday, April 26, 2013

PERMIT NO. 1000651

Station DAR ES SALAAM **Start Date** March 16, 2013 **End Date** April 05, 2013 **Package Type** 21 DAYS **Extra Days:** 0

This RESIDENT'S / VISITOR'S Permit is Granted to RUSSEL JETER **of Address** **Passport No.** (b) (6)

Who holds Weapon (Type) RIFLE **Calibre** 375/500/470 **Maker's Number** (b) (6) **C.A.R Number** 0

Licence Number 0 **Dated** 11-Mar-2013 **Issued At** **Weapon ow** RUSSEL JETER

and entitles him to hunt the below animals in the (Game area and blocks) BURUNGE GAME CONTROLLED AR

owned by NORTHERN HUNTING ENTERPRISES LTD

PH MARK SULLIVAN,

Additional Blocks

(b) (6)

Mkurugenzi
Idara ya Wanyamapori
DAR ES SALAAM

Signature of Issuing Officer & Official Stamp

	SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1	AFRICAN ELEPHANT	1	
2	BABOON	3	
3	BUFFALO	3	
4	BUSHBUCK	1	
5	BUSHPIG	1	
6	CIVET CAT	1	
7	COMMON DUIKER	1	
8	DIKDIK	1	
9	DOVE	5	
10	DUCKS	5	
11	ELAND	1	
12	FRANCOLIN	5	
13	GEESE	5	
14	GRANTS GAZELLE	2	
15	GUINEA FOWLS	5	
16	HARTEBEEST	2	
17	HONEY BADGER (RATEL)	1	
18	HYENA	1	
19	IMPALA	2	
20	JACKAL	1	
21	KLIPSPRINGER	1	
22	LEOPARD	1	
23	LESSER KUDU	1	
24	LION	1	
25	ORYX	1	
26	OSTRICH	1	
27	PORCUPINE	1	
28	REEDBUCK	1	
29	SAND GROUSE	5	
30	STEINBUCK	1	
31	THOMSON GAZELLE	2	
32	WARTHOG	1	
33	WATERBUCK	2	
34	WILDEBEEST	2	
35	ZEBRA	2	

1. This permit must be surrendered to a Licensing Officer of the Wildlife Division within 21 days of its expiry or immediately the Professional hunter returns from safari
2. This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on the business of a Trophy dealer.
3. The maximum number of animals must not be exceeded without the written authority of the Director of Wildlife
4. The Hunter must obtain Certificate of Ownership for all trophies he wishes to keep, transfer or sell.
5. A Professional Hunter conducting a safari must get a guide or letter of authority to go out alone from the District Game Officer
6. For weapon indicate the heaviest rifle in the case of big game or shortgun in the case of birds.

GAME KILLED

MINISTRY OF NATURAL RESOURCES AND TOURISM

WILDLIFE DIVISION

March 13, 2013 3:27:58 pm

10519

PERMIT NO. 1000651

COMPANY NORTHERN HUNTING ENTERPRISES LTD

GAME AREA BURUNGE GAME CONTROLLED AREA

ADD. BLOCKS

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	Head Makeup O-	Head Makeup +O	Head Makeup +o-	ECOLOGY
ZEBRA	35	BURUNGE C.A.	500/.375	17/3/013	8.00Am	♂				
WARTHOG	32	〃	〃	17/3/013	9.01Am	♂				
HARTEBEEST	15	〃	〃	18/3/013	10.02Am	♂				
BUFFALO	3	〃	〃	19/3/013	7.20Am	♂				
HYAENA	18	〃	〃	21/3/013	7.20Am	♂				
LEOPARD	22	〃	〃	21/3/013	5.31Pm	♂				
WATERBUCK	33	〃	〃	26/3/013	10.05Am	♂				
BUFFALO	3	〃	〃	27/3/013	5.00Pm	♂				
CIVET CAT	6	〃	〃	28/3/015	8.10Am	♂				
LION	24	B. GAME G. AREAS	〃	29/3/013	7.30Am	♂				
DIK DIK	8	〃	〃	29/3/013	8.30Am	♂				
ELEPHANT	1	〃	〃	29/3/012	5.45Pm	♂				

DECLARATION TO BE SIGNED BY PERMIT HOLDER AND OFFICER TO WHOM PERMIT IS SURRENDERED

I (Na[redacted](g) (g)..... hereby [redacted](g) (g) ame killed is a true record of all animals killed or wounded by me during the v

DATE

DER

NAME & SIGNATURE OF RECEIVING OFFICER

DATE

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA30348C-0

Effective: 05/08/2017 Expires: 05/07/2018

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:

RUSSELL JETER
(b) (6)
ANACORTES, WA 98221
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 Tanzania 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 2013 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 Tanzania.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE
A Force for Wildlife Conservation

† Baron Bertrand des Cleers, Ph.D
† James G. Teer, Ph.D.
† Bart O'Gara, Ph.D.
† Don Lindsay

Board of Directors:
John J. Jackson, III, J.D.
Chrissie Jackson
Philippe Chardonnet, D.V.M.
Bert Klineburger
Shane Mahoney
René Snider

RCVD JUN 5 2017

May 22, 2017

U.S. Fish and Wildlife Service
Division of Management Authority
Attention: Luis Rivera
5275 Leesburg Pike
Falls Church, Virginia 22041

Re: Permit 30348C

Dear Luis:

Thank you for speaking with me today. Attached please find the amendment application and its attachment, and the originally issued permit. As we discussed, please reissue as a CITES Appendix-I import permit for the import of a sport-hunted elephant trophy from Tanzania.

Please do not hesitate to contact me if you have any questions about this permit or the information submitted.

Thank you for your prompt attention to the reissuance of this permit.

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: cf@conservationforce.org
www.conservationforce.org

Russell Jeter

Application for Reissuance of Permit: MA30348C-0

Response to Question E.3.b / E.6.b:

I request reissuance of this permit to correct two errors. First, this permit is titled "Elephant Import from South Africa" in the top right corner. However, as stated in my application and in Conditions A and E, the elephant was hunted in Tanzania and not South Africa.

Second, I believe this is not the correct permit form. Elephant from the United Republic of Tanzania are listed on Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). To comply with CITES, the U.S. Management Authority must issue an import permit. However, the permit referenced above does not say anything about CITES. I am concerned Tanzania's Management Authority will not be able to issue an export permit and I will not be able to comply with Condition E if the FWS does not issue a CITES-compliant import permit.

Accordingly, I request the permit referenced above be reissued on a standard CITES import permit form, signed by the CITES Management Authority, and the language "elephant import from South Africa" be removed.

Certification:

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 above. I hereby request re-issuance of this permit with the indicated changes.

Signature: (b) (6) **Date:** 5-23-17

Original, Unused Permit Returned

ELEPHANT IMPORT FROM SOUTH AFRIC/

Permit Number: MA30348C-(
Effective: 05/08/2017 Expires: 05/07/201

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:
RUSSELL JETER
(b) (6) [redacted]
ANACORTES, WA 98221
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 Tanzania 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 2013 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 Tanzania.

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 JUN 5 2017

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Jeter	Russell		

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions
(b) (6)			N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Anacortes	WA	98221	Skasit	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Anacortes	WA	98221	Skasit	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue MA30348C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

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 MA30348C-0.

2. Submit the original permit with this application.
   Please see attacked.

3. **Past activities.**
   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit. N/A
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

   Please see attached.

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:** 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

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: N/A _____ 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.

Please see attached.

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):

Applicant or 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.

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
17US30348C/9

2. Valid
05/07/2018

3. Permittee (name and address, country)
RUSSELL JETER
(b) (6)
ANACORTES, WA 98221
U.S.A.

4. Consignor (name and address, country)
GAME FRONTIERS OF TANZANIA LTD.
P.O. BOX 19746
DAR ES SALAAM
TANZANIA

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. ELEPHANT MUST NOT HAVE BEEN TAKEN FROM ANY MORATORIUM AREA INCLUDING LONGIDO CONTROLLED HUNTING AREA (CHA).

TROPHY MUST HAVE BEEN TAKEN DURING 2013 HUNTING SEASON

THIS REPLACES AND AMENDS MA30348C-0 ISSUED 05/08/2017.

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

-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.

07/06/2017
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: AFRICAN ELEPHANT Scientific Name: LOXODONTA AFRICANA	9. 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: TANZANIA
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

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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

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
BERT KLINEBURGER
SHANE MAHONEY
RENEE SNIDER

July 25, 2017

U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike
Falls Church, Virginia 22041

Attention: Luis Rivera

Re: Permit 17US30348C/9

Dear Luis:

Enclosed please find an amendment application and its attachment, and the originally issued permit to import an elephant from Tanzania. This permit has been reissued once, and I request reissuance a second time to amend the Consignor name. I hunted with an affiliate of Game Frontiers of Tanzania and want to ensure my export and import permits match exactly. Please do not hesitate to contact me if you have any questions about this permit or the information submitted.

Thank you for your prompt attention to the reissuance of this permit.

Sincerely,

(b) (6)

Russ Jeter

3240 S I-10 Service Rd. W. Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone (504) 837-1233 • Fax (504) 837-1145 • E-mail cf@conservationforce.org
www.conservationforce.org

Russell Jeter

Application for Reissuance of Permit: MA30348C-0

Response to Question E.3.b / E.6.b:

I request reissuance of this permit to amend the name of the Consignor (Box 4). I hunted with one of Game Frontiers of Tanzania's subsidiaries, namely, Northern Hunting Enterprises Ltd. My CITES export permit refers to Northern Hunting Enterprises Ltd. Therefore, to avoid any difficulty in import, I request reissuance with "Northern Hunting Enterprises Ltd., P.O. Box 20965, Dar es Salaam, Tanzania" identified as the Consignor.

Certification:

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 above. I hereby request re-issuance of this permit with the indicated changes.

Signature: (b) (6) **Date:** 7-26-17

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
17US30348C/9

2. Valid
05/07/2018

3. Permittee (name and address, country)
RUSSELL JETER
(b) (6)
ANACORTES, WA 98221
U.S.A.

Original, Unused
Permit Returned

4. Consignor (name and address, country)
GAME FRONTIERS OF TANZANIA LTD.
P.O. BOX 19746
DAR ES SALAAM
TANZANIA

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. ELEPHANT MUST NOT HAVE BEEN TAKEN FROM ANY MORATORIUM AREA INCLUDING LONGIDO CONTROLLED HUNTING AREA (CHA).

TROPHY MUST HAVE BEEN TAKEN DURING 2013 HUNTING SEASON

THIS REPLACES AND AMENDS MA30348C-0 ISSUED 05/08/2017.

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

-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.

07/06/2017
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 AFRICAN ELEPHANT Scientific Name LOXODONTA AFRICANA	9. 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 TANZANIA
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

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OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Jeter	Russell		

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Anacortes	WA	98221	Skasit	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Anacortes	WA	98221	Skasit	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA30348C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

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 17US30348C/9.

2. Submit the original permit with this application.

   Please see enclosed.

3. **Past activities.**
   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit. N/A
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

   Please see enclosed explanation.

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:** 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

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: N/A 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.

Please see enclosed page.

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 signatu (b) (6) Date: 7-26-17

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):

Applicant or 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.

Rivera, Luis <luis_rivera@fws.gov>

PRT# 30348C

1 message

Rivera, Luis <luis_rivera@fws.gov> Thu, Sep 7, 2017 at 3:10 PM
To: "John J. Jackson, III" <cf@conservationforce.org>

Good afternoon.

I have been assigned your application to amend your permit to import an elephant from Tanzania. In order to continue processing your application, please sign and date page 1 of the application and reply to this email with the completed, scanned version.

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

Rivera, Luis <luis_rivera@fws.gov>

PRT# 30348C

1 message

Regina A. Lennox <regina.lennox@conservationforce.org> Fri, Sep 15, 2017 at 2:07 PM
To: "Rivera, Luis" <luis_rivera@fws.gov>

Dear Luis,
Attached please find Russ' signed amendment form. He is mailing the hard copy today.
Thanks very much,
Regina

USFW elephant application.pdf
1349K

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Jeter	Russell		

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6) [redacted]			N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Anacortes	WA	98221	Skasit	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6) [redacted]

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Anacortes	WA	98221	Skasit	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA30348C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***appli... of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best ... that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted]
Sign... onsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 9-14-17

Russell Jeter

Application for Reissuance of Permit: MA30348C-0

Response to Question E.3.b / E.6.b:

I request reissuance of this permit to amend the name of the Consignor (Box 4). I hunted with one of Game Frontiers of Tanzania's subsidiaries, namely, Northern Hunting Enterprises. My CITES export permit refers to Northern Hunting Enterprises. Therefore, to avoid any difficulty in import, I request reissuance with "Northern Hunting Enterprises, P.O. Box 20965, Dar es Salaam, Tanzania" identified as the Consignor.

Certification:

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 above. I hereby request re-issuance of this permit with the indicated changes.

Signature: [redacted] **Date:** 9-14-17

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

BOARD OF DIRECTORS:
JOHN J. JACKSON, III, J.D.
CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
BERT KLINEBURGER
SHANE MAHONEY
RENEE SNIDER

July 25, 2017

U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike
Falls Church, Virginia 22041

Attention: Luis Rivera

Re: Permit 17US30348C/9

Dear Luis:

Enclosed please find an amendment application and its attachment, and the originally issued permit to import an elephant from Tanzania. This permit has been reissued once, and I request reissuance a second time to amend the Consignor name. I hunted with an affiliate of Game Frontiers of Tanzania and want to ensure my export and import permits match exactly. Please do not hesitate to contact me if you have any questions about this permit or the information submitted.

Thank you for your prompt attention to the reissuance of this permit.

Sincerely,

(b) (6)

Russ Jeter

3240 S I-10 Service Rd. W., Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: cf@conservationforce.org
www.conservationforce.org

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
17US30348C/9

2. Valid
05/07/2018

3. Permittee (name and address, country)
RUSSELL JETER
(b) (6)
ANACORTES, WA 98221
U.S.A.

4. Consignor (name and address, country)
NORTHERN HUNTING ENTERPRISES LTD.
P.O. BOX 20965
DAR ES SALAAM
TANZANIA

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. ELEPHANT MUST NOT HAVE BEEN TAKEN FROM ANY MORATORIUM AREA INCLUDING LONGIDO CONTROLLED HUNTING AREA (CHA).

TROPHY MUST HAVE BEEN TAKEN DURING 2013 HUNTING SEASON

THIS REPLACES AND AMENDS 17US30348C/9 ISSUED 07/06/2017.

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

-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.

09/18/2017
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 AFRICAN ELEPHANT Scientific Name LOXODONTA AFRICANA	9. 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 TANZANIA
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

718696

RCVD SEP 27 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
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Jeter	Russell		

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Anacortes	WA	98221	Skasit	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Anacortes	WA	98221	Skasit	USA

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 ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA30348C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best o[illegible] at 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/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 9-14-17

RCVD SEP 27 2017

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

BOARD OF DIRECTORS:
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CHRISSIE JACKSON
PHILIPPE CHARDONNET, D.V.M.
BURT KLINEBURGER
SHANE MAHONEY
RENEE SNIDER

July 25, 2017

U.S. Fish and Wildlife Service
Division of Management Authority
5275 Leesburg Pike
Falls Church, Virginia 22041

Attention: Luis Rivera

Re: Permit 17US30348C/9

Dear Luis:

Enclosed please find an amendment application and its attachment, and the originally issued permit to import an elephant from Tanzania. This permit has been reissued once, and I request reissuance a second time to amend the Consignor name. I hunted with an affiliate of Game Frontiers of Tanzania and want to ensure my export and import permits match exactly. Please do not hesitate to contact me if you have any questions about this permit or the information submitted.

Thank you for your prompt attention to the reissuance of this permit.

Sincerely,

(b) (6)

Russ Jeter

3240 S I-10 Service Rd. W., Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax: (504) 837-1145 • E-mail: [illegible]@conservationforce.org
www.conservationforce.org

Russell Jeter

Application for Reissuance of Permit: MA30348C-0

Response to Question E.3.b / E.6.b:

I request reissuance of this permit to amend the name of the Consignor (Box 4). I hunted with one of Game Frontiers of Tanzania's subsidiaries, namely, Northern Hunting Enterprises. My CITES export permit refers to Northern Hunting Enterprises. Therefore, to avoid any difficulty in import, I request reissuance with "Northern Hunting Enterprises, P.O. Box 20965, Dar es Salaam, Tanzania" identified as the Consignor.

Certification:

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 above. I hereby request re-issuance of this permit with the indicated changes.

Signature: (b) (6) **Date:** 9-14-17

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

RCVD JUN 27 2018

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
JeTer	Russell	D	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

(b) (6)

B. 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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Anacortes	WA	98221	Skagit	USA

2.a. (b) (6) (contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Anacortes	WA	98221	Skagit	USA

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 ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue 17US30348C/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other *app*[redacted] and I certify that the information submitted in this application for a permit is complete and accurate to the bes[redacted] statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

6-21-18

Sig[redacted] permit (No photocopied or stamped signatures) 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 17US30348C/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: (b) (6) Date: 6 21 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):

   Russell Setzer
   (b) (6)

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.

   Fedex # (b) (6)

   ☐ 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): Ross Seier

(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.

June 21, 2018

US Fish and Wildlife

Renewal request of permit # 17US30348C/9

Pursuant to renewal application instructions 3. Past activities B.

I was issued the permit on permit on September 18, 2017 and promptly submitted it to the Tanzanian hunting outfitter/exporter who applied for the appropriate export permits and signatures. They failed to secure the last signature required prior to my permit expiration on May 7th, 2018 and thus were not able to ship it to me.

Please issue a renewal so I can try to get it exported from Tanzania and imported to the US.

Thank you,

(b) (6)

Russell Jeter

FORM 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
17US30348C/9

2. Valid
05/07/2018

3. Permittee (name and address, country)
RUSSELL JETER
(b) (6)
ANACORTES, WA 98221
U.S.A.

4. Consignor (name and address, country)
NORTHERN HUNTING ENTERPRISES LTD.
P.O. BOX 20965
DAR ES SALAAM
TANZANIA

Original Issued
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. ELEPHANT MUST NOT HAVE BEEN TAKEN FROM ANY MORATORIUM AREA INCLUDING LONGIDO CONTROLLED HUNTING AREA (CHA).

TROPHY MUST HAVE BEEN TAKEN DURING 2013 HUNTING SEASON

THIS REPLACES AND AMENDS 17US30348C/9 ISSUED 07/06/2017.

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

-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.

09/18/2017
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: AFRICAN ELEPHANT Scientific Name: LOXODONTA AFRICANA	9. 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: TANZANIA
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:

718696

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No 1018-0093
Expires 05/31/2017

MAY 17 2017

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Cooper	Ronald	Ward	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6) [redacted]			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Houston	TX	77015	Harris	USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of [illegible] false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) [redacted] 5-12-2017

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

      Loxodonta Africana - 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:

      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):

      South Africa, Limpopo Province, nearest town is Marken.
      Ranch: Shelanti Reserve, Gate Cor: 523° 29' 3688", E028° 23' 58.22"

   b. Date wildlife was hunted:

      July 28th 2015

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

2 each Tusks, 2 Skin Panels, 4 Foot Stools, 1 each Tail Mount, Elephant Skin Chair

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]:

Estelle Nel Taxidermy, Roodepoort Plot 122
Bella Bella, 0480 Limpopo 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 also appear on your Namibian export permit and must match the U.S. import permit].

Name:	Louise Grobler
Business Name:	Estelle Nel Taxidermy
Address:	Roodepoort Plot 122
Address:	
City:	Bella Bella
State/Province:	Limpopo RSA
Country, Postal Code:	0480

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

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: 5-12-2017

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) [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):

Ron Cooper (b) (6) [redacted]
(b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA36381C-0

Effective: 06/26/2017 Expires: 06/25/2018

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:

RONALD WARD COOPER
(b) (6) [redacted]
HOUSTON, TX 77015
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 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. 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 2015 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 South Africa.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

RCVD NOV 30 2017

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
(Enter address from Page 4 and 5 of application)

Type of Activity:
REPLACEMENT DOCUMENT
(CITES/ESA/MMPA/WBCA/LACEY ACT)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
COOPER	RONALD	WARD	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
HOUSTON	TX	77015	HARRIS	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 $50 nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA36381C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Lynette Leggy, Well Worldwide Energy, Atty-in-fact 11/28/2017

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

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:
   MA36381C-0

2. Current location of specimen (include address and country):
   SAFARI AIR CARGO SYSTEMS
   HOLDING 34, 5TH AVENUE,
   BREDELL GAUTENG 1623, RSA

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):
   SAME AS PAGE 1

7. 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 6. I understand that you will contact me for my credit card information once the application has been processed.

8. Who should we contact if we have questions about the application? (Include name, phone number, and email):

RON COPPER, (b) (6) [redacted]
or
LYNETTE LILLEY, WELL WORLDWIDE, 281-606-2400, llilley@well-usa.com

9. **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# X

Cell Phone# X (b) (6) [redacted]

SS# (b) (6) [redacted]

Email X (b) (6) [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) X RONALD WARD COOPER (your name
(Full legal name(s) of individual, partners, LLC, or corporation, with fictitious "d/b/a" as appropriate)
doing business as [redacted] under the laws of the State of (4) [redacted], residing ~~or having a principal~~
home address (5) X (b) (6) [redacted] Houston TX 77015

hereby constitutes and appoints **WELL Worldwide Energy Logisitics, 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, 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 ( ) [redacted] (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 1641(f)).

IN WITNESS WHEREOF, the said Grantor has caused these presents to be sealed and signed:

(signature) X Ron Cooper (capacity) (7) [redacted]
(If Duly Authorized Representative, supporting documentation must be provided)

(print name) (8) X RONALD WARD COOPER (date) (9) X 5-15-17

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.

Rev. 01/2007

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA36381C-0
Effective: 06/26/2017 Expires: 06/25/2018

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

Permittee:

(b) (6) [redacted] ER

CHIEF, BRANCH OF PERMITS, DMA

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 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. 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 2015 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 South Africa.

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).

December 11, 2017

Mr. Rogelio Hubbard

Ref: 36381C

I am sending this letter in response to your email requesting I answer question 4 on page 2 of gov/form 3-200-66. I haven't received shipment on trophies permit # MA36381CO, permit was accidentally thrown away with some other papers.

I am requesting replacement U.S. Cities Permit.

Thank you.

(b)(6)

Ronald W. Cooper

KIMBERLY COPAUS
NOTARY PUBLIC
STATE OF TEXAS
EXPIRES
FEBRUARY 1, 2019

(b) (6)

Dated 12-11-2017

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA36381C-1

Effective: 12/21/2017 Expires: 06/25/2018

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:

RONALD WARD COOPER
(b) (6) [redacted]
HOUSTON, TX 77015
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

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), 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. 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 2015 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 South Africa.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

RCVD NOV 20 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 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
White	Stevan	Hugh	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Edinburg	Va.	22824	Shenandoah	U.S.A.

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17us27099c/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applicable parts in Chapter I of Title 50 of the Code of Federal Regulations; that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief; and that I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature (Electronic or stamped signatures) — Date of signature (mm/dd/yyyy): 11/17/2017

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 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:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: Country-Zimbabwe area-Gwayi Concession-Gwayi Farms GPS-S18373558 E027104410 nearest town- Hwange nearest city-Bulawayo
   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: Gwayi, Zimbabwe(Gwayi Farms)GPS -S18373558- E027104410- near Hwange
   b. Date wildlife was hunted:

      October 30, 2016

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

tusks four feet 2 mounted as foot stools with elephant skin on top and 2 mounted as waste baskets 1 ear painted and 1 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]:

Collett's Wildlife Artistry 15 Josiah Road Belmont Bulawayo Zimbabwe +263 9 885868

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:	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 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: 11/17/2017

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):
Stevan White (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ryan	Jimmie	R	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			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	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Alabaster	AL	35007		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?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US71502B9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Atty in fact — 12/14/16

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) — 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: 12/14/16

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.

FORM 3-201A (1/97)

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)
JIMMIE R. RYAN
(b) (6)
ALABASTER, AL 35007
U.S.A.

4. Consignee (name and address, country)
KWALATA SAFARIS
PLOT NO. 6980
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

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

-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.

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.	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

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 a 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) [redacted]

Delivery John Halpin GRP 0483P

CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That Jimmie Roger Ryan (Full Name)

Residing at (b) (6) [redacted] Albastfy AL. 35007

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 merchandize 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 duly 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 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 the power shall in no case have any force of 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 correspondences from Matthew Mayers dba Genus Logistics, who is directed to forward all documents and invoices 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 R Ryan

has caused these presents to be sealed and signed: (Signature) (b) (6) [redacted] Date: 9-02-15

WITNESS: (b) (6) [redacted] Date: 9-02-15

We the People
PASSPORT
PASSEPORT
PASAPORTE
UNITED STATES OF AMERICA
P
USA
RYAN
JIMMIE ROGER
UNITED STATES OF AMERICA
M
United States
Department of State
USA
SEE PAGE 51
P<USARYAN<<JIMMIE<ROGER<<<<<<<<<<<<<<<<<<<<<<
(b) (6)

RECEIVED
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By
RCVD MAR 5 2018

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
RYAN	JIMMIE	R	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			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	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ALABASTER	AL	35007		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? 17US71502B9
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other applic... ...tle 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of ... ...any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signatu... ...ble for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) 2/15/18

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 (http://www.fws.gov/forms/3-200-2.pdf) and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 (http://www.fws.gov/forms/3-200-3.pdf) and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66, http://www.fws.gov/international/pdf/permit-application-form-3-200-66-replacement-document.pdf. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to http://www.fws.gov/international/permits/by-form-number/index.html to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. **Permit number.** Enter the permit number to be reissued/renewed/amend 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 sig[redacted] 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 SUITE 205
   JAMIACA,N.Y 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):

MATT MAYERS
7187900216
MATT@GENUSLOGISITICS.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 3-201A (1/97)

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No.
17US71502B/9

2. Valid
01/05/2018

3. Permittee (name and address, country)
JIMMIE R. RYAN
(b) (6)
ALABASTER, AL 35007
U.S.A.

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 15US71502B/9 ISSUED 12/11/2015.

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

-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.

01/06/2017
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: 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.	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

(b) (6)

Department (b) (6) ry
U.S. Custor idual
141 (b) (6)
(b) (6)

Social Security # (b) (6)

Delivery JOHN MORRIS GRP BASSPI

CUSTOMS POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS: That, JIMMIE ROGER RYAN (Full Name)

Residing at, (b) (6) ALBASTY AL. 35007

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, steed 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 merchandize 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 merchandize, to receive any merchandize 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 connect on 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 sect on 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 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 the power shall in no case have any force or effect after the expiration of 2 years from the date of its execution

Pursuant to 19 CFR 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 R RYAN

has caused these presents to be sealed and signed: (Signature) (b) (6) Date: 9-02-15

WITNESS: (b) (6) Date: 9-02-15

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 (e-mail)

Permits, FWHQ <permits@fws.gov>

Mar 14 2018 4:30:01; Acknowledgement letter for Permit No. "82699C""

2 messages

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 KEVIN LINES
(b) (6)
COLLEYVILLE, TX 76034
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

RCVD MAR 14 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	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Lines	James	Kevin	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Colleyville	TX	76034	Tarrant	U.S.A.

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA744316-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) 2/28/2018

Signature (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: 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: 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:

Leopard - Farm Moedhou (Kleeberg) # 112, Okahandja, Okahandja, Otjozondjupa of Namibia; Elephant - Mahango National Park, Divundu, Rundu, Kavango East

   b. 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: (b) (6) 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) [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.

Permits, FWHQ <permits@fws.gov>

Mar 14 2018 4:30:01; Acknowledgement letter for Permit No. "82699C""

2 messages

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 KEVIN LINES
(b) (6)
COLLEYVILLE, TX 76034
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]

Lines, Theresa

From: Lines, Jim
Sent: Thursday, March 29, 2018 4:28 PM
To: Lines, Theresa
Subject: Fwd: CITES APPLICATION

Did you not send a check in with this?

RCVD APR 03 2018 LS

-------- Original message --------
From: "Hubbard, Rogelio" <rogelio_hubbard@fws.gov>
Date: 3/29/18 3:43 PM (GMT-06:00)
To: "Lines, Jim" <(b) (6)
Subject: CITES A

Good afternoon James,

Ref: 82698C, 82699c

Our office received a permit application request for the import. In order to comply with your request, please reply to the following:

1. Please provide a check or money order to the U.S Fish and Wildlife Service of 100 Dollar for the propose activity.

In accordance with 50 CFR 13.11(e) if the requested information is not received by this office by 05/14/2018 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 propose 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
www.cites.org

APPLICANT:

JIM LINES

NAMIBIA
GROWTH IN
AGRICULTURAL COMMODITIES
-WILDLIFE & TOURISM-

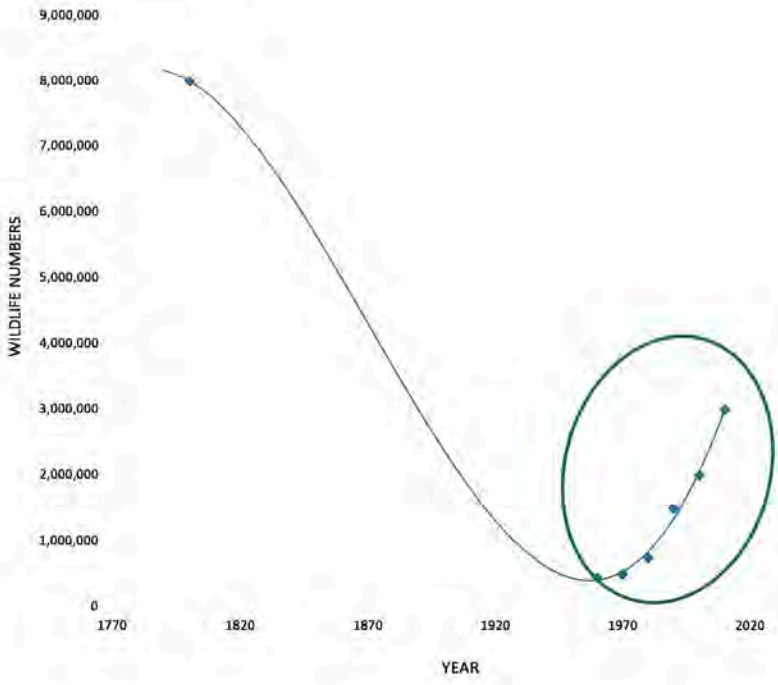
Growth in agricultural commodities:

- Wildlife & Tourism -

Chris Brown

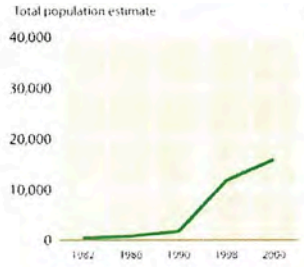
NCE
Namibian Chamber of Environment

Changing wildlife number in Namibia over past 240 years

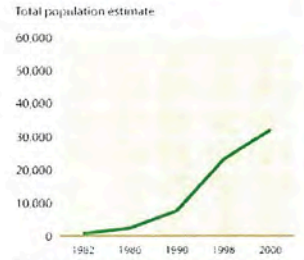


- ✓ State devolved rights over wildlife to land owners & custodians
- ✓ Wildlife became part of the rural economy
- ✓ Led to a multi-purpose wildlife economy comprising tourism, trophy hunting, meat harvesting, own use and live sale

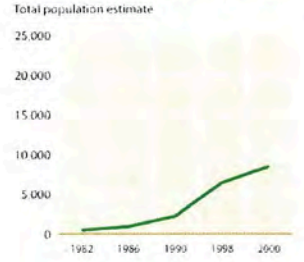
Oryx

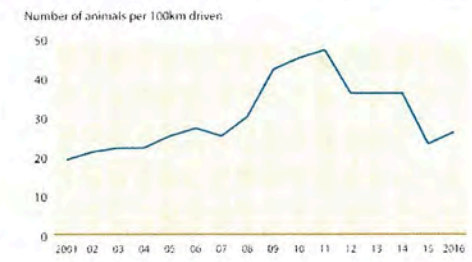


Springbok

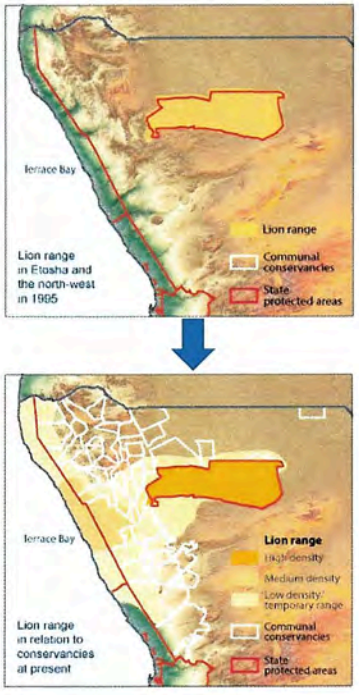


Mountain Zebra





Lion 1995 - 2015



Trends in iconic species

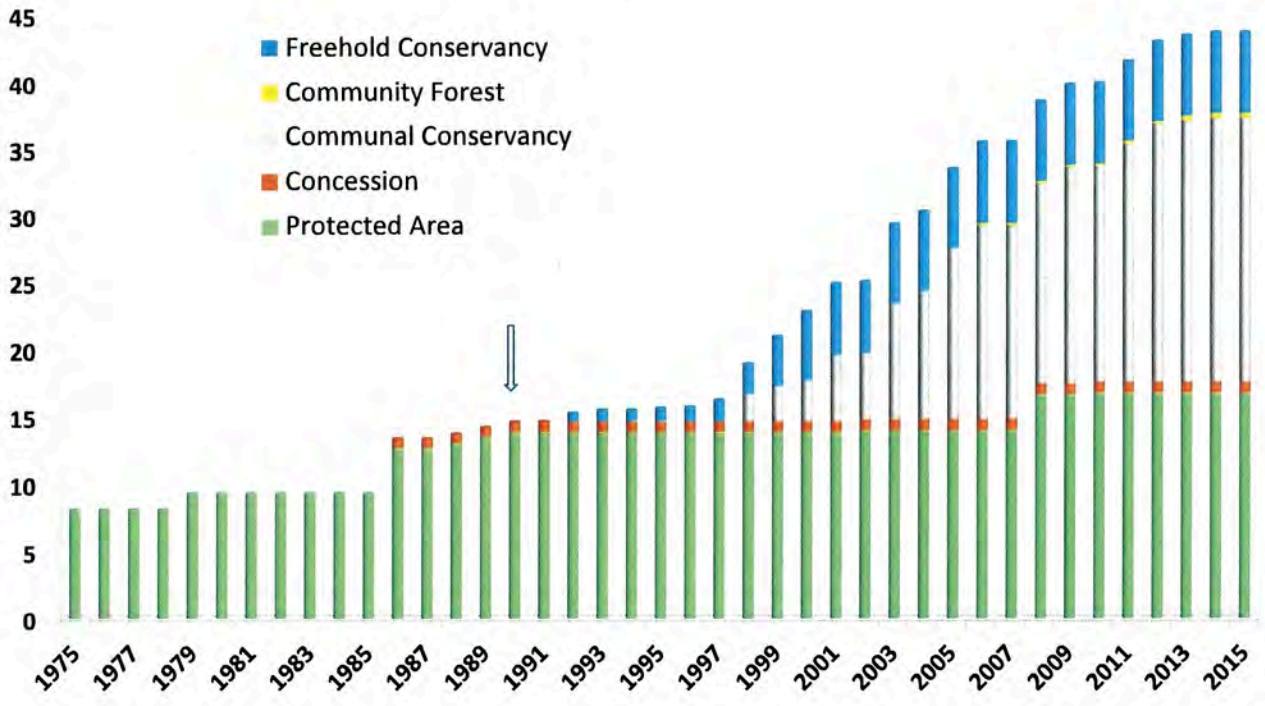
Elephant

- **1995: 7,600**
- **2017: 23,000+**

Black Rhino

- **1980: Near extinct**
- **2015: Largest national population & largest population outside state parks in world**

Land under various forms of wildlife management



Types of land management systems and percentage of country

Land under wildlife	Percent
State protected areas	18
Privately protected areas	1
Wildlife & tourism concession areas	1
Communal conservancies	20
Freehold “conservancies”	6
State & community forests	1
Registered hunting farms	4
Informal – farms using wildlife	?
Total	51+

Namibia's land-tenure systems wrt wildlife

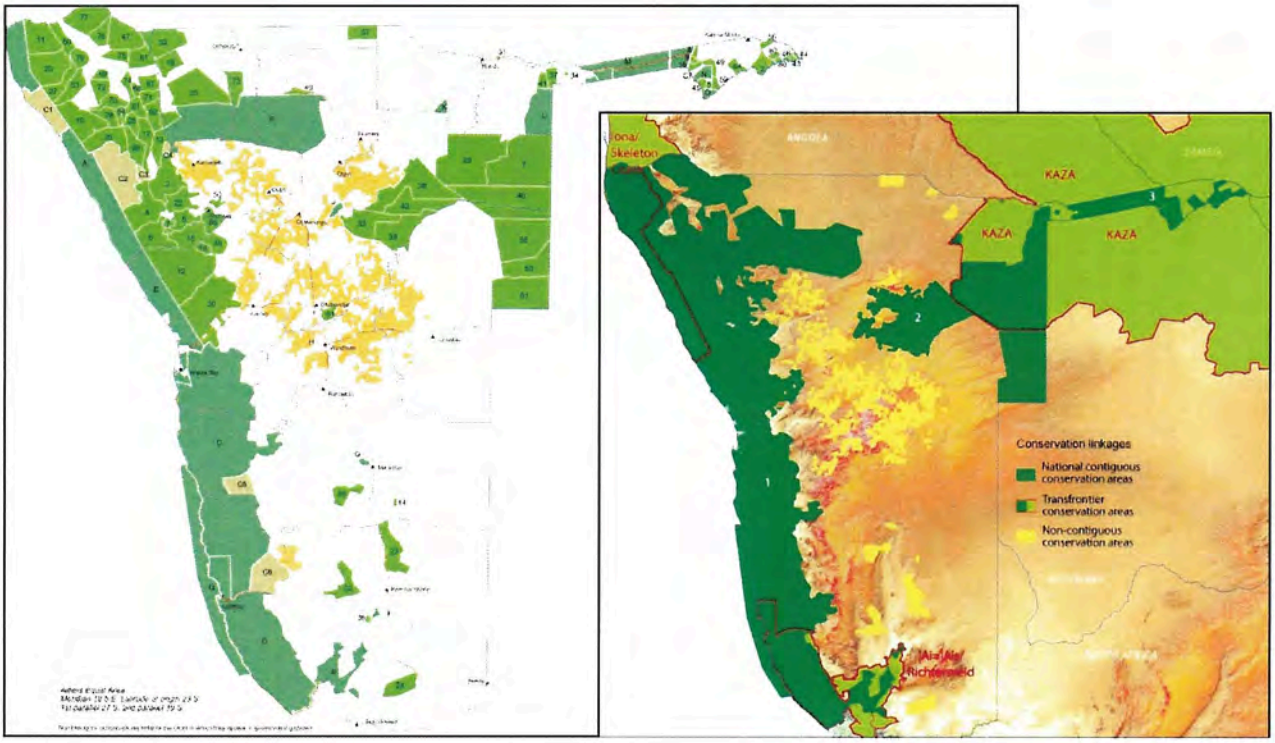
Land tenure units	Land area	Wildlife
Freehold (privately owned) land	42%	82%
Communal land	40%	12%
National Parks	17%	6%

Freehold – conditional use rights since mid-1960s – based on surveyed farms – private ownership & management

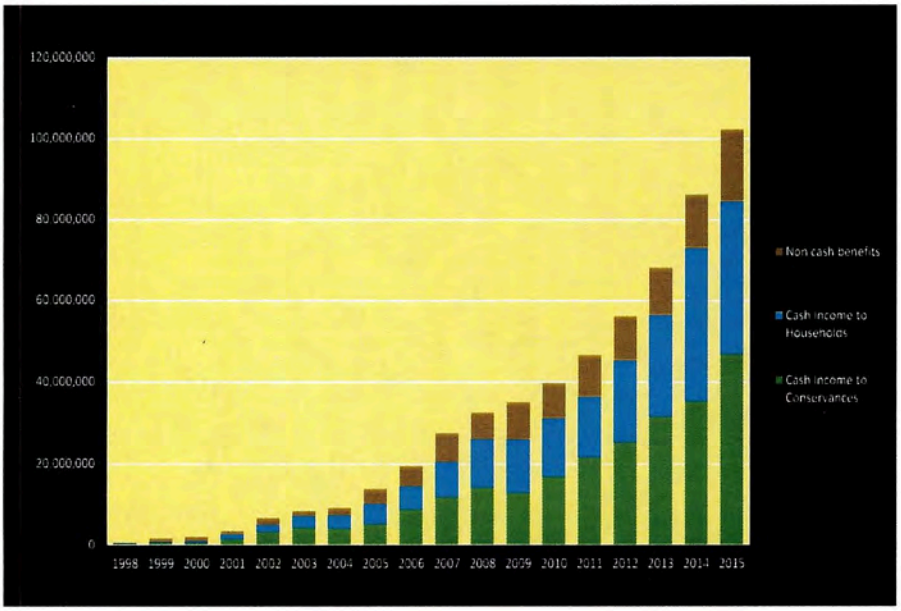
Communal – conditional use rights since mid-1990s – based on registration of a "conservancy" – communal ownership & management

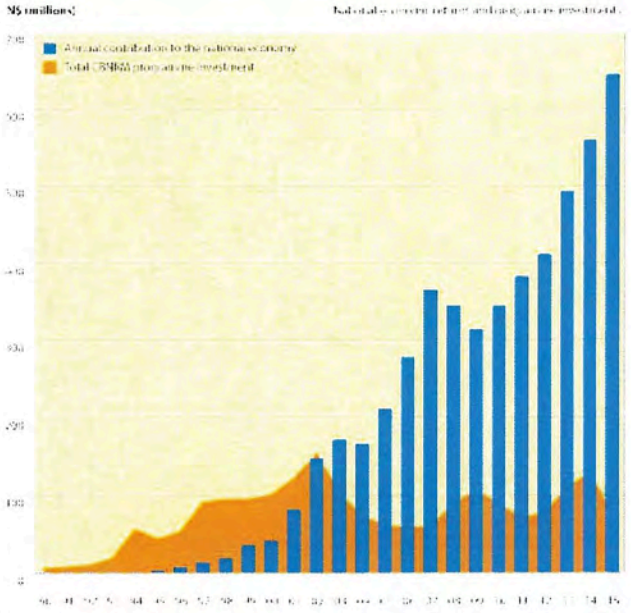
National Parks – based on Nature Conservation Ordinance – State held (on behalf of the nation) and State managed.

What this means at a landscape level

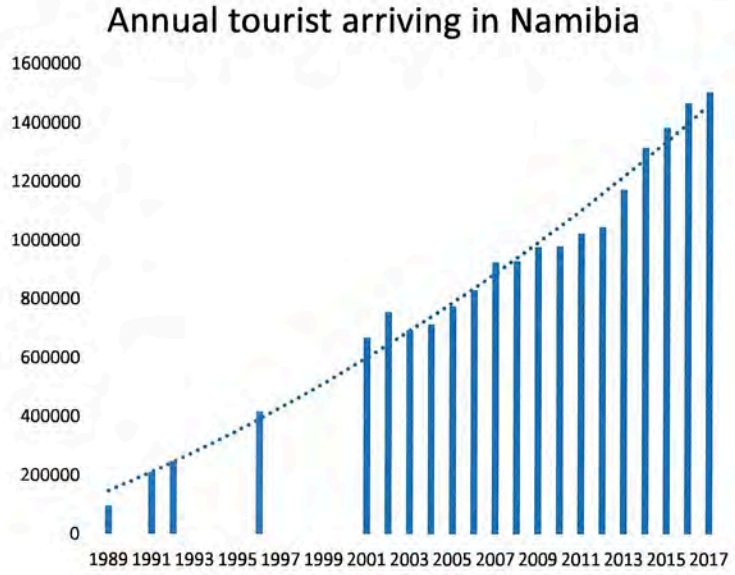


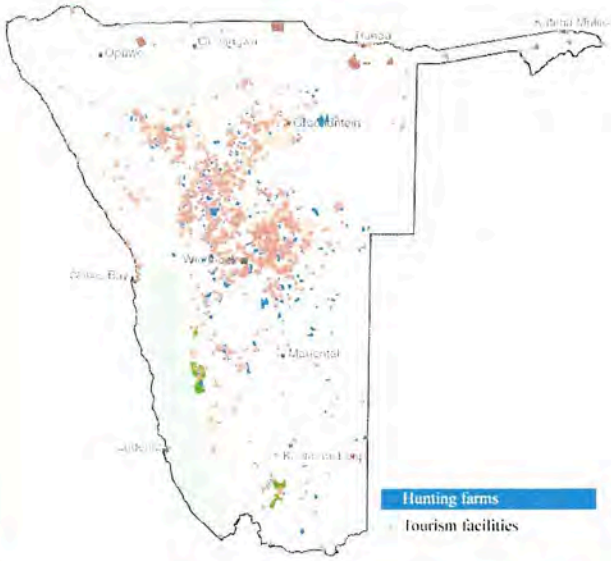
Changing contribution of wildlife on communal land …



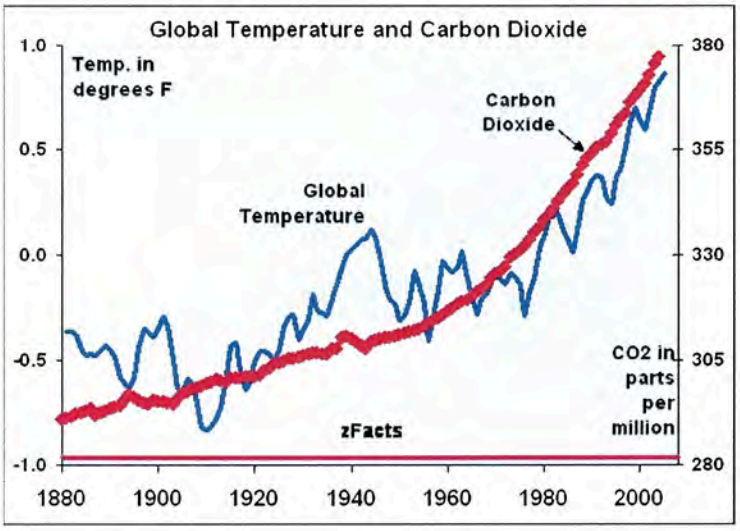


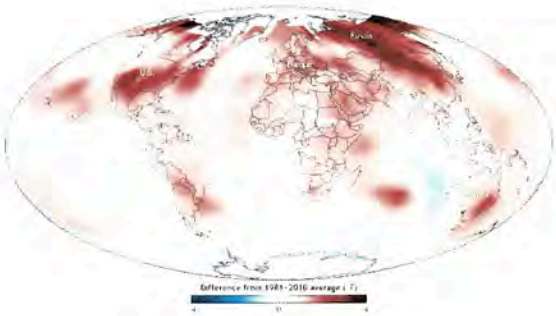
Tourism growth and distribution of tourism facilities

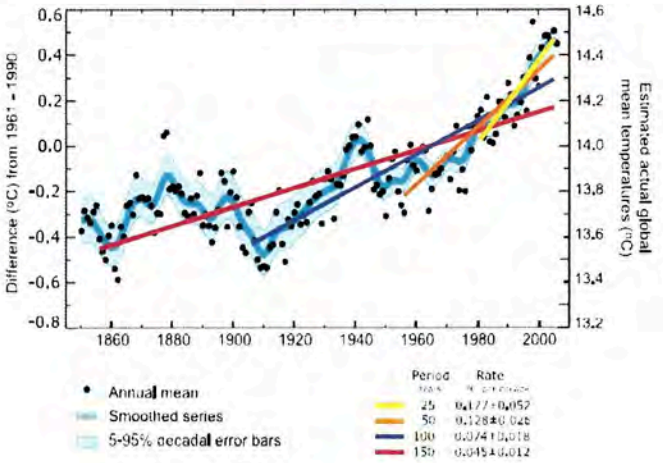




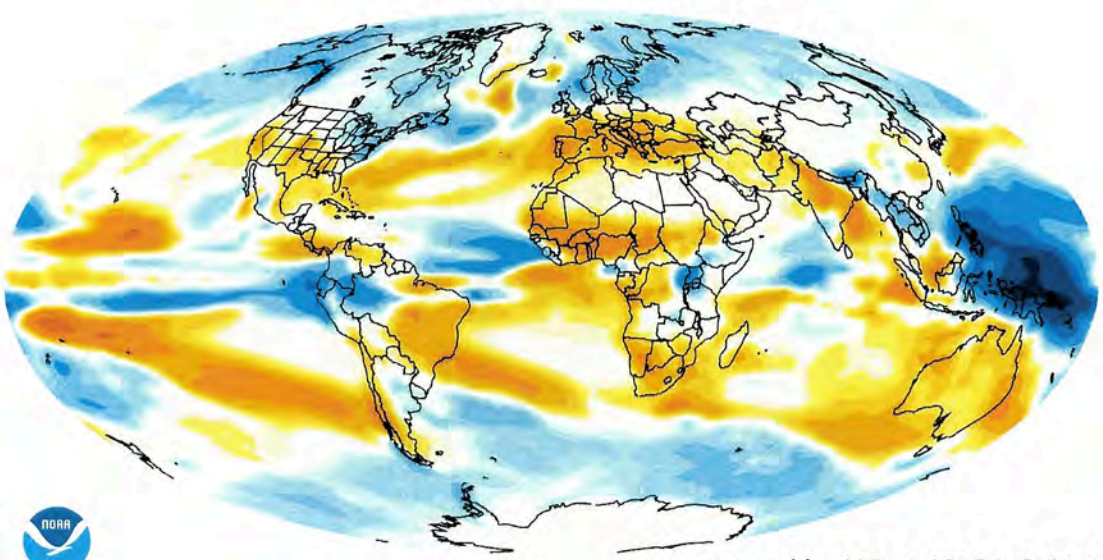
Implications of climate change on land use and productivity







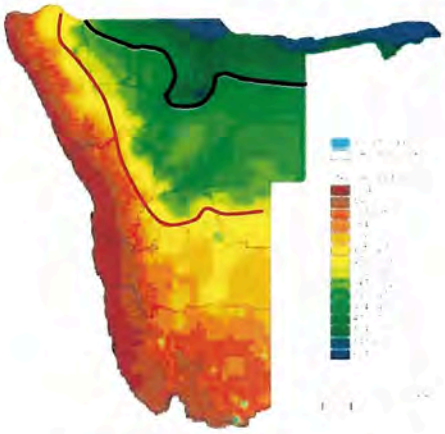
CHANGE IN PRECIPITATION BY END OF 21st CENTURY
inches of liquid water per year



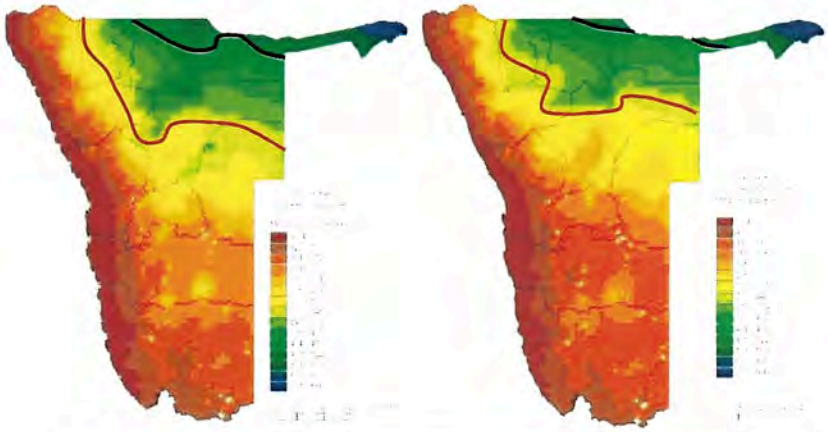
as projected by NOAA/GFDL CM2.1

Climate change

Median Climate change projections ... (in reality – happening faster)

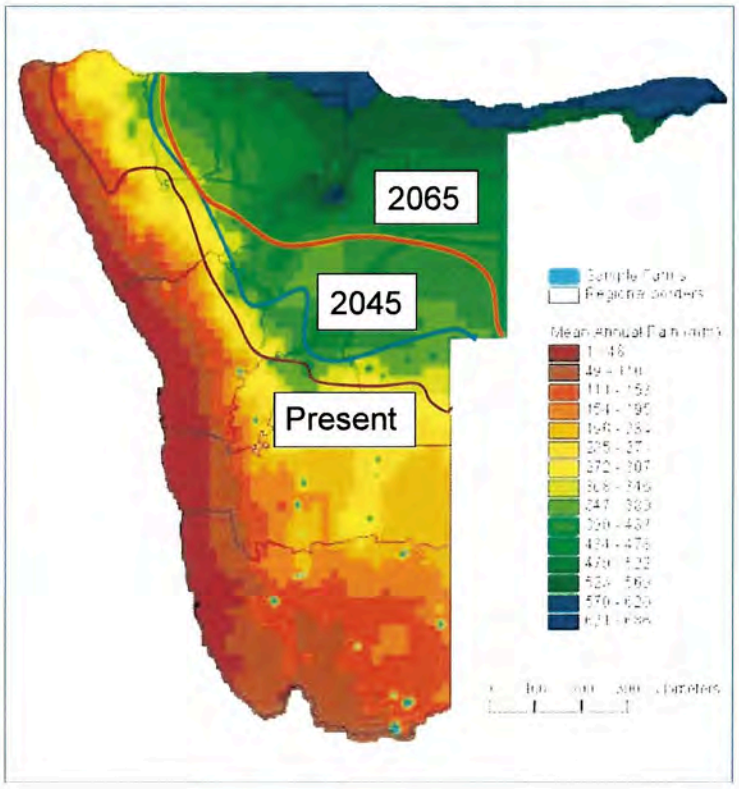


Current mean annual rainfall across Namibia



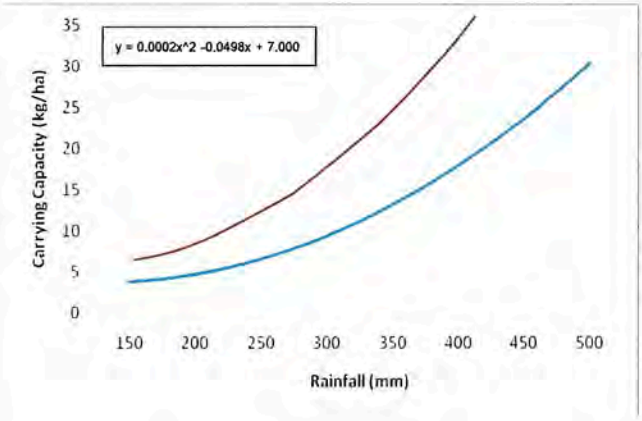
Projected mean annual rainfall across Namibia by 2045 and 2065, according to predictions generated by the HADCM3 general circulation model

Economic viability under commercial cattle farming

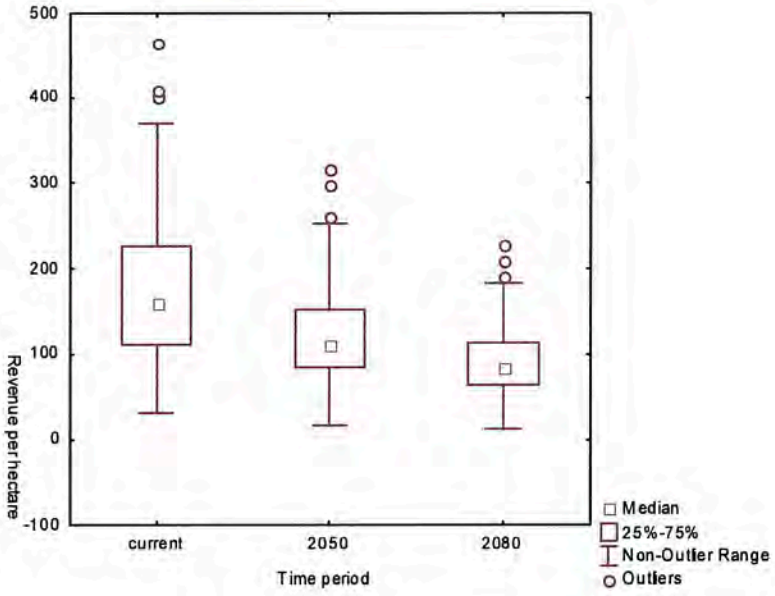


Large-stock areas lost	
By 2045	By 2065
9 million ha	**18 million ha**

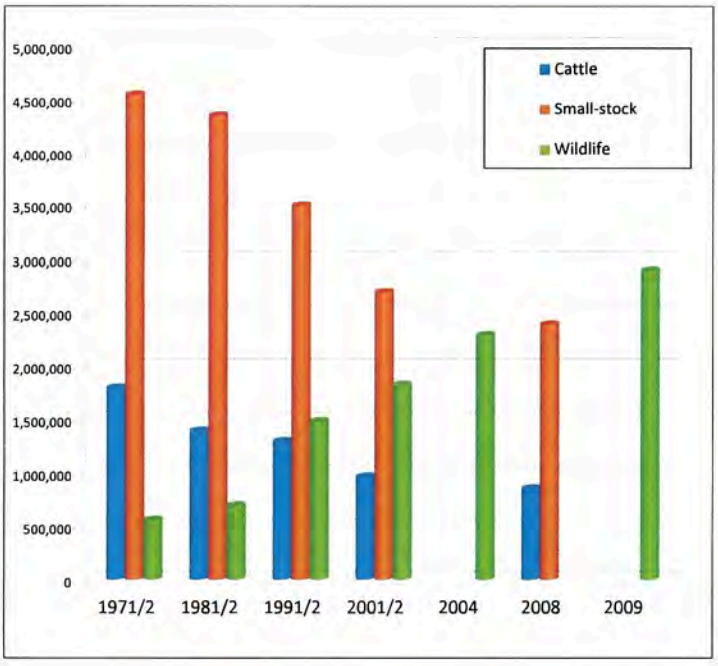
Relationship between rainfall and carrying capacity



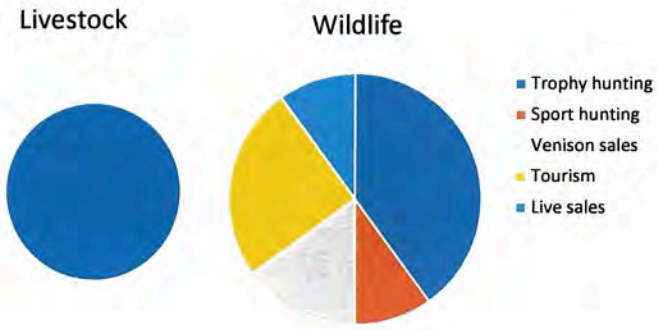
Livestock farming revenue is strongly linked to annual rainfall. 1% change in rainfall = 1.36% change in revenue: 20% decline in rainfall = 27% drop in revenue = unviable.



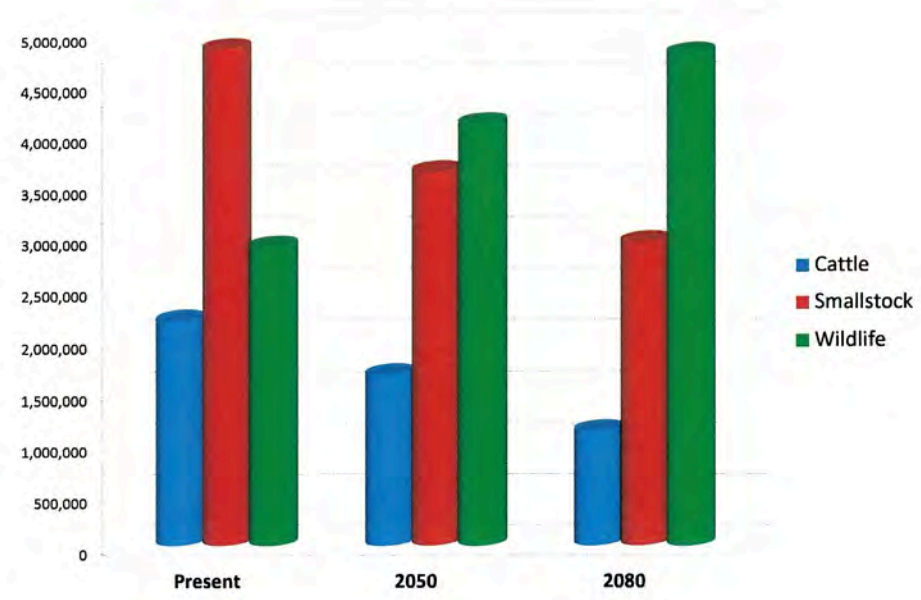
Changing contribution of livestock & wildlife on freehold land ...



Financial returns – central Namibia

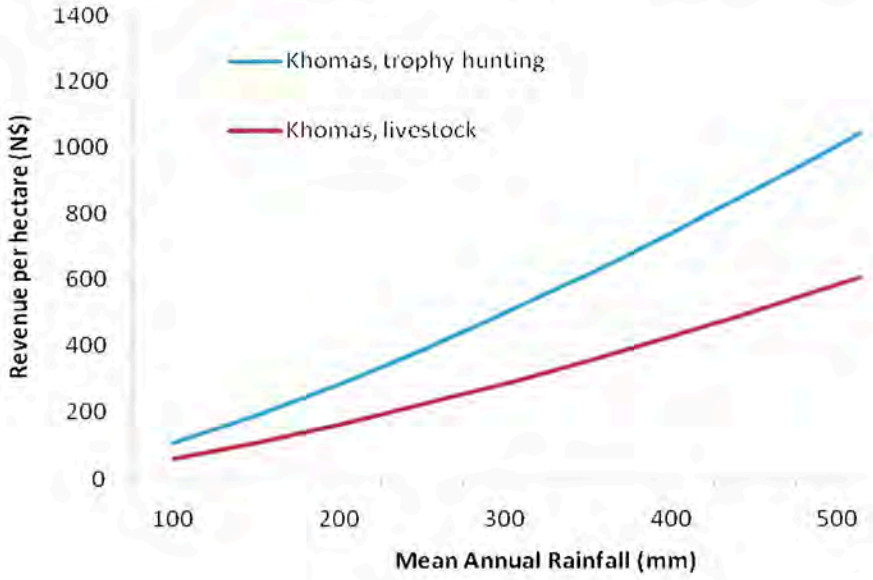


Projected livestock and wildlife numbers on freehold land in response to climate change



Trophy hunting

- Takes off about 1% of the national wildlife herd per year
- Contributes about 20% more to GDP than the small-stock sector

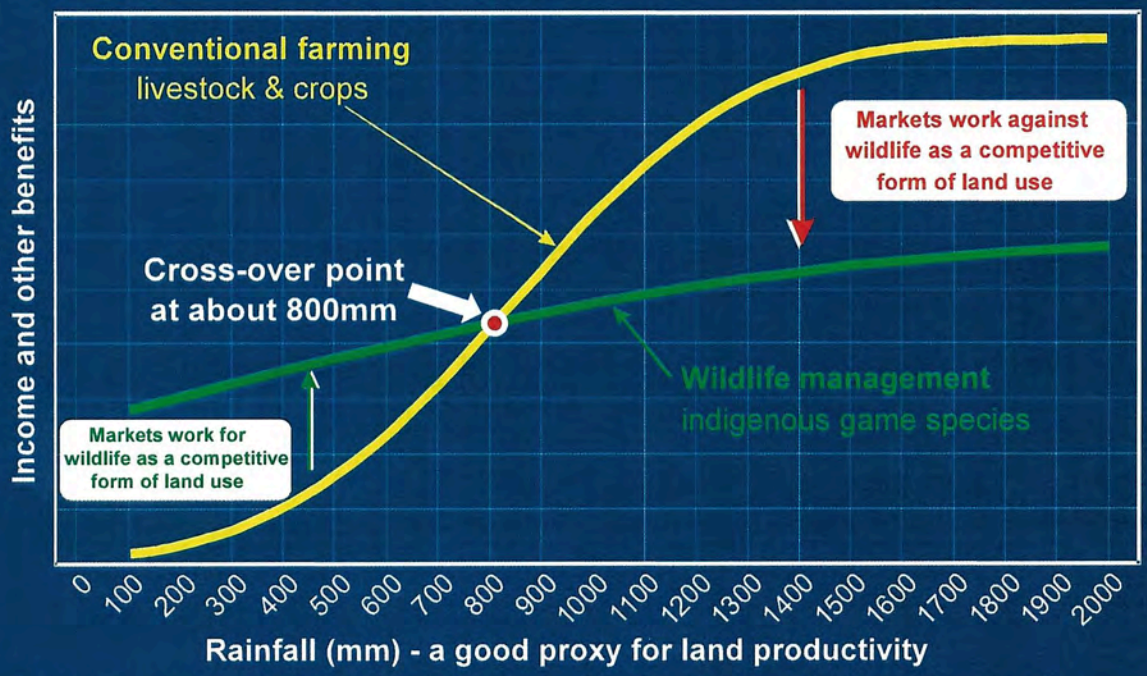


Tourism

Region	Land use	Employees per 1,000 ha	Gross Value Added (GNI) per ha (N$)	Net Value Added (NNI) per ha (N$)
Karas (Karoo)	Communal livestock	0.85	3	2
Karas (Karoo)	Freehold livestock	0.17	2	0.8
Karas (Karoo)	Tourism	0.76	83	69
Hardap (Namib)	Tourism	5	601	516
Hardap (Kalahari)	Tourism	4	504	342

Region	Land use	Employees per 150 ha	GNI per ha (N$)	NNI per ha (N$)
Zambezi	Communal livestock	0.8	60	50
Zambezi	Communal cropping	75	626	443
Zambezi	Tourism	45	18,968	18,394

Why are land owners moving into wildlife and out of livestock?

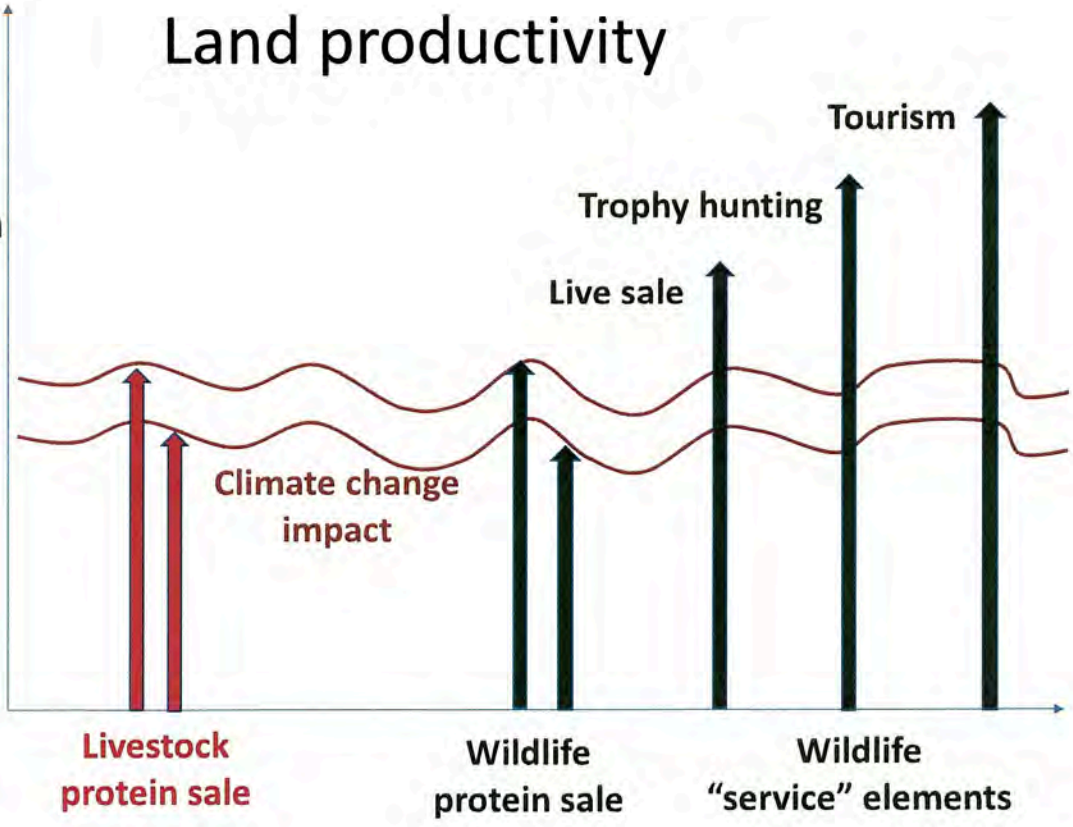


Economic returns to conventional farming (yellow line) and to wildlife management (green line) in areas of different land productivity, with rainfall being a good proxy for productivity

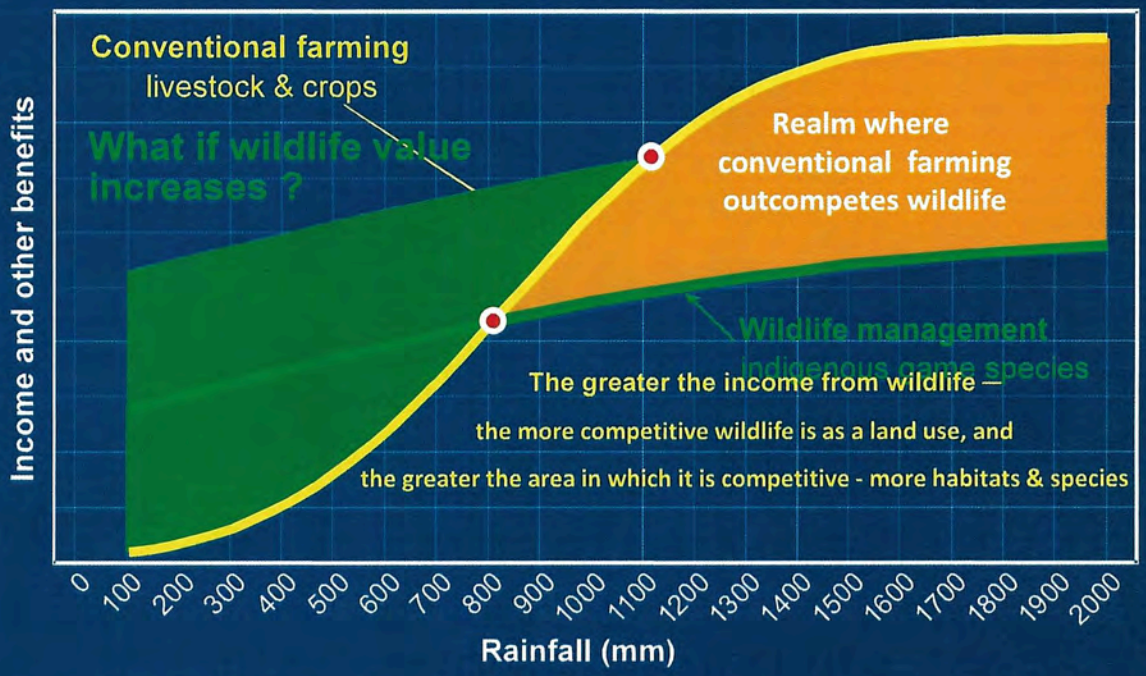
Service industries break through low primary production ceiling

Primary production ceiling

- Protein price
- Protein biomass
- Protein quality
- Area
- Soil
- Rainfall
- Management
- Agricultural policy
- Production costs



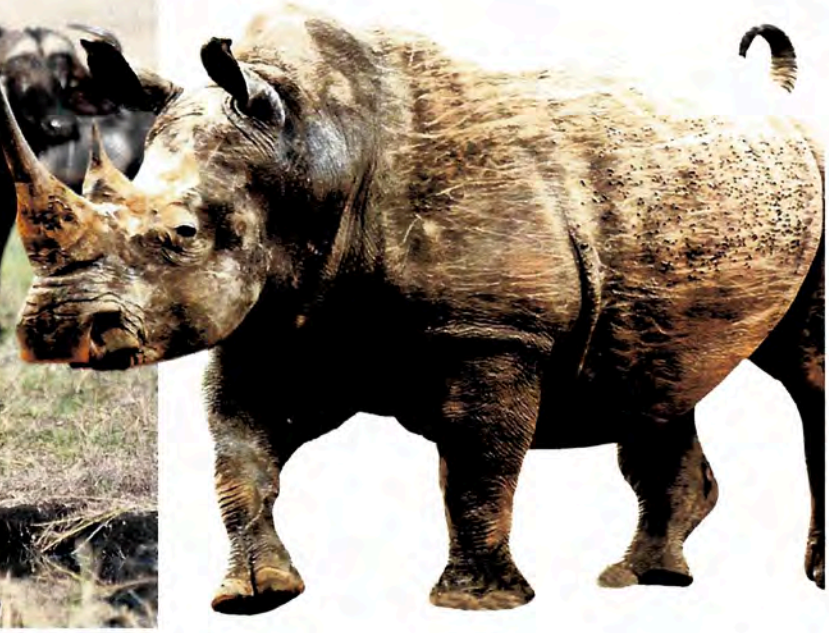
How could wildlife be even more attractive as a land use?



Improving economic returns to wildlife management over conventional farming in areas of different land productivity, with rainfall being a good proxy for productivity

How to increase value of wildlife?

1: Bring high value species into production

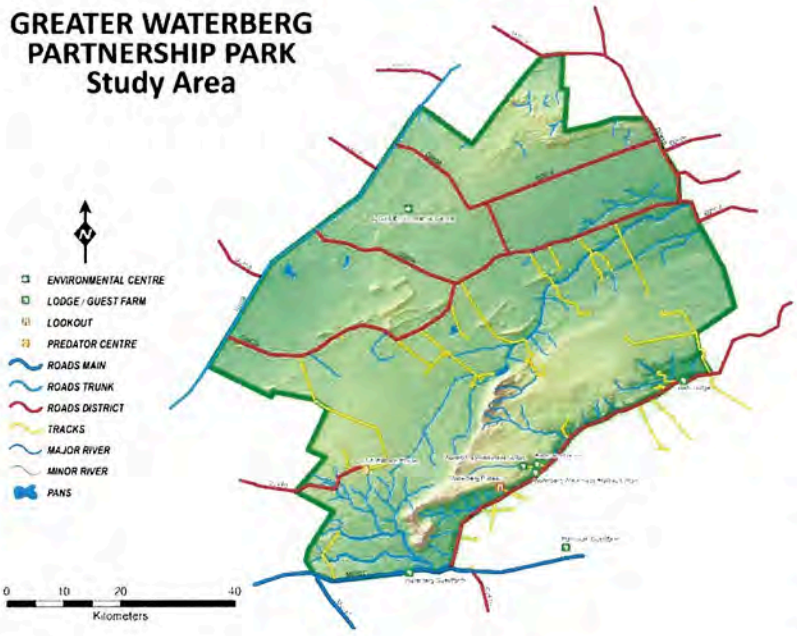


Why wildlife is a strategic response to climate change

- Wildlife is arid adapted
- Wildlife makes more $ / ha than conventional farming under our conditions
- Wildlife revenue per ha could be increased 4-5 times by adding in all wildlife species (especially buffalo and rhino)
- Wildlife has service elements (tourism & trophy hunting) that break through the low primary production / protein value ceiling
- Wildlife lends itself to working at scale – more efficient and productive
- Wildlife would be the largest renewable economy in Namibia
- Namibia could essentially climate-proof itself, and out-perform its land productivity levels prior to climate change
- Namibia could be an example to Africa, following this model to rewild the continent driven by market forces

How to increase value of wildlife?

2: Work at scale and diversity

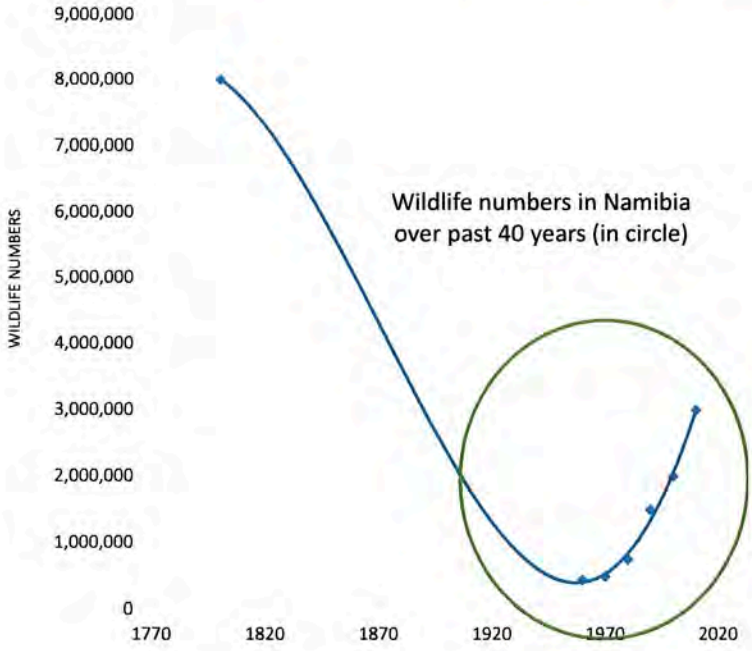


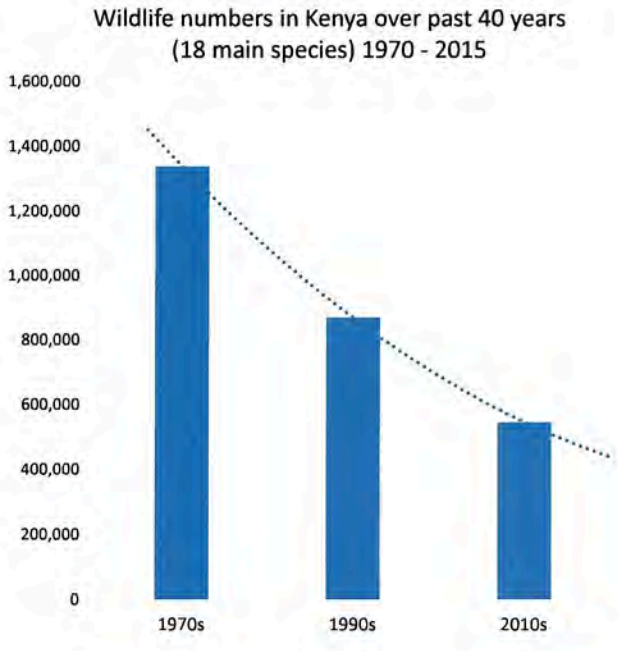
Why scale is important

- Large unfenced landscapes offer more economic opportunities
- Land value immediately increases when land is part of a larger vision and programme / story
- Tourism is enhanced – marketability, diversity, occupancy, pricing (and willingness to pay) because of a better product and experience
- Trophy hunting is enhanced because of the large open African landscape – no fences – better experiences and thus higher prices
- More diversity of wildlife – including predators and elephant, thus better marketability and revenue
- More diversity of enterprises – abattoir / meat processing facility, tannery, cannery, commercial outlets, etc.
- More institutional / organisational options, e.g. management agreements, shareholding (land Co, game Co, cattle Co, tourism Co) giving flexible options
- Financial diversification (land owners are also benefit financially from all enterprises), and more financing options

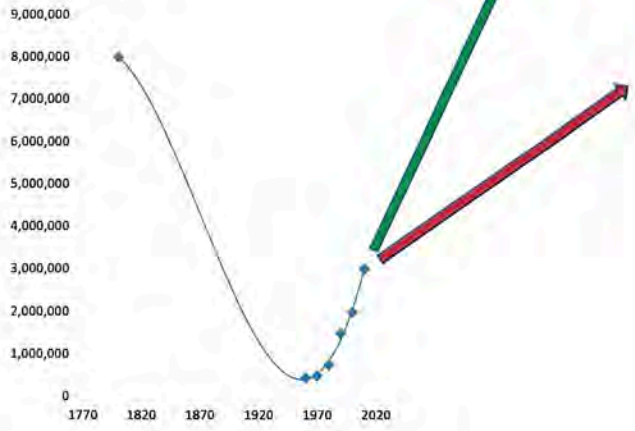
How to increase value of wildlife?

3: Protect our global competitive advantage





Where to from here?



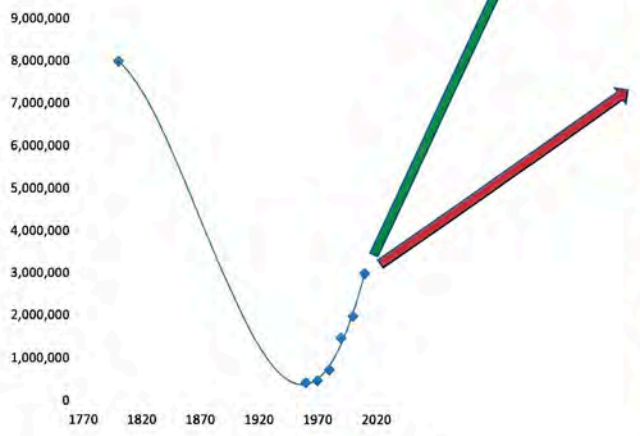
High road

- Open systems – landscape approach
- Indigenous species
- Natural ecological & evolutionary processes
- Good rangeland management and condition

Low road

- Intensification (small camps)
- Land fragmentation
- Selective breeding – colour morphs, hybrids
- Exotic species
- Cage breeding & hunting
- Land degradation

Where to from here?



High road

- National opportunities (all land owners & custodians)
- Long-term perspective
- Environmental integrity & resilience
- Drought-proofs and adapts to climate change
- Major conservation benefits - biodiversity, landscapes, connectivity
- Promotes Namibia's international conservation standing
- Enhances Namibia's economic competitiveness

Low road

- Get rich quick for a few
- Short-termism
- Environmental degradation
- No contribution to conservation values
- Compromises Namibia's conservation integrity
- Diminishes Namibia's economic competitiveness

Conclusions

1. Build on Namibia's comparative and competitive wildlife advantages
2. Link wildlife as a land-use to economic development and to biodiversity conservation - they are all aligned (marketing value)
3. Align markets to work for sustainable use of wildlife, conservation of biodiversity and indigenous ecosystems through focused policies and legislation (including export of game meat and landscape approach)
4. Devolve rights and responsibilities over sustainable wildlife use still further to local level (reduce bureaucracy)
5. Use protected areas to create incentives for compatible adjacent landscapes and as "engines" for landscape development
6. Limit the role of government to that of creating a conducive environment, regulating for equity and providing extension and capacity-building services to those who need them

Thanks you

ceo@n-c-e.org

www.n-c-e.org

APPLICANT:

JIM LINES

OPERATOR ENHANCEMENT REPORT

Conservation Force v.5/8/18
Operator Enhancement Questionnaire

1. Name of area operator: Peter Thormahlen

   a. Years in business: 20

   b. Name of company conducting hunt: Thormahlen & Cochran Safaris

   2. Name of concession: **Mahango NP** **Size in km²: 30,000 ha**

   a. Land tenure: __ Government lease X__ Community _ Private ranch __ Private conservancy

   b. Length of concession agreement: 4 years Can it be renewed? __ Yes _X_ No

   c. Length of renewal, if applicable: Auction every 4-5 Years

   d. Estimated total amount received in trophy fees last year, if applicable: $400,000

   e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain: Government Concession – none of the above required

   f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: Nearest town is Divundu. Map, attachment 1,

   g. If the concession borders a national park, please provide the park name: _____Concession is Mahango National Park_____

h. Description of general and distinctive habitat features and any water features: Biotype is made up of Kanago River, Riverine Area, as well as Miombo Forest area

3. Are there any communities living in the concession? Yes _X_ No

   a. If so, estimated number of people or villages in the concession?

4. Are there communities bordering this concession? X_ Yes __ No

   a. If so, estimated number of people or villages around the concession? Divundu Town Area, Kavango Tribe

5. Relevant game populations in the concession:[1]

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	**abundance**	1,000-1,500	stable	MET Game Count Surveys
Lion	average	20	stable	MET Game Count Surveys
Leopard	abundance	100	upwards	MET Game Count Surveys

[1] The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

Hippo	abundance	500	upwards	MET Game Count Surveys
Crocodile	abundance	1,500	upwards	MET Game Count Surveys
Roan Antelope	abundance	400	upwards	MET Game Count Surveys
Kudu	abundance	1,000	upwards	MET Game Count Surveys
Sable Antelope	abundance	400	upwards	MET Game Count Surveys
Prey species	Abundance: zebra, giraffe, baboon, Steenbuck, grey duiker, impala, reedbuck	7000+	upwards	MET Game Count Surveys

Wildlife monitoring in the Park is done by Ministry of Environment & Tourism (MEFT)

6. Total employment number: __5_____

   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	4	2
Trackers	4	3
Anti-poaching scouts/rangers	0	
Other anti-poaching	Namibia Game Department - MET	
Cooks/housekeepers	2	2
Community coordinators		
Managers	1	1
Biologists		
Others: _____	2	2

7. Number of staff employed in the off-season: 13 - anti-poaching excluded.

   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	0		
Managers	2	1	2014-2017
Maintenance	2	2	2014-2017
Road opening/construction			

Community relations personnel			
Others: _____			

8. Anti-poaching efforts:[2]

   a. Number of anti-poaching staff: National Park -MET is doing Anti-Poaching

   b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both

   c. Months during which anti-poaching patrols are conducted: every month

   d. Number of anti-poaching patrols per month: Anti-poaching is done 24/7 in the National Park by Park Officials

   e. Description of anti-poaching equipment, vehicles, etc.: Patrol 4x4 cars and on foot.

   f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? Namibian Government - MET

   g. Do you offer rewards to poaching informants leading to arrest? __ Yes _X_ No

   h. Do you offer rewards to poaching informants upon conviction? Yes _X_ No

   i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? The anti-poaching campaign done by Parks personnell

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts				
Equipment				
Vehicles				
Petrol				
Rewards paid				
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered				
Elephant carcasses observed				
Lion carcasses observed				
Leopard carcasses observed				
Ivory poachers arrested				

[2] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

Meat poachers arrested				
Other poachers arrested				
Poachers convicted				
Snares/gin traps collected				
Firearms confiscated				
Vehicles confiscated				
Bicycles confiscated				
Boats/nets confiscated				
Tusks recovered				
Other: _____				

The Game Department does not share information. Poaching is a sensitive issue and therefore no information in this regard is available to us to complete the above table. However, because of all the anti-poaching programs run in the area, poaching of antelope is zero, or so little that we don't know of any incidents.

10. Community investment:[3]

a. Does the company contribute money or goods/services to local communities? _X_ Yes _ No

b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? __voluntary and donated by our overseas clients – mostly USA citizens who donates school stationary to schools in the area.

c. Does the company provide game meat to nearby communities? x_ Yes __ No

d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: All the game meat hunted by us and as per the allocated quotas of the Minister of Environment and Tourism, go to the local community

Yearly the following Game is harvested:
Elephant x 2 @ 4,500 kg per carcass @N$22 / kg = N$198,000
Hippo x 4 @ 1,500 kg per carcass @N$22 / kg = N$132,000
Buffalo x 4 @ 800 kg per carcass @N$22 / kg = N$70,400
Kudu x 2 @ 120 kg carcass @N$22 / kg = N$5,280
Giraffe x 1 @ 750 kg carcass @N$22 / kg =N$16,500
Sable x 2 @ 150 kg carcass @N$22 / kg =N$6,600
Roan x 2 @ 150 kg carcass @N$22 / kg =N$6,600
Impala x 4 @ 50 kg carcass @ N$22 / kg = N$2,640

TOTAL = N$438,020.00

[3] The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe.

National Park -Park Officials on duty

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in?

There is a Government Fund that refunds the community for damages.

Species	Damage caused	Consolation paid 2016	Consolation paid 2017	Consolation paid 2018
Elephant				
Lion				
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? _____US$_____

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	$1,750	$3,500	$4,000	20 blue bags @ $200 per bag = $4000, or N$55000. Clients donate $200, we will up the bag to the total of $200 with the necessary school or educational supplies, identified by the local schools.0-
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching				
Local government activities				
Water infrastructure improvements				
Sports teams funded	$500	$500	$500	

Construction materials donated				
Other: _____				
Other: _____				
TOTALS	$2,250	$4,000	$4,500	

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay?

Please note: we operate in South Africa and Namibia, and the figures below, is for the whole operation

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 4 2016: 9 2017: 5	2015: 2016: 2017:	2015: 2 2016: 9 2017: 9	2015: 126 2016: 110 2017: 141
Percentage of U.S. clients	2015: 99 2016: 98 2017: 100	2015: 2016: 2017:	2015: 100 2016: 98 2017: 99	2015: 95 2016: 96 2017: 97
Trophy fees paid by U.S. clients	2015: 220000 2016: 495000 2017: 275000	2015: 2016: 2017:	2015: 42000 2016: 225000 2017: 256000	2015: 303 715 2016: 1075 000 2017: 997 375

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients: _95%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

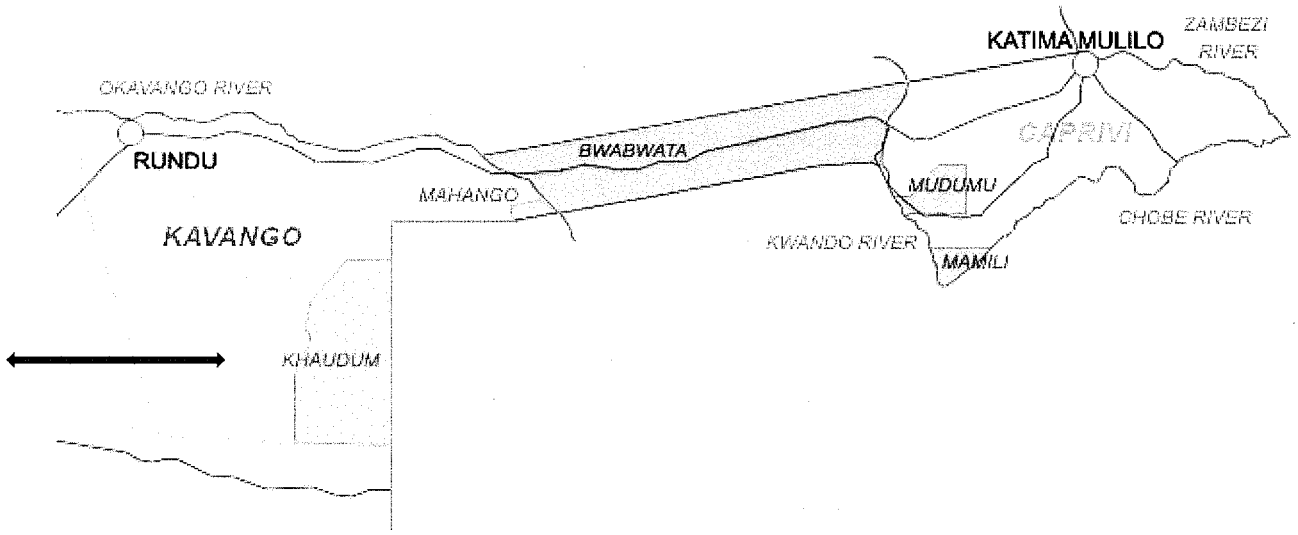
Thormahlen & Cochran operates on other conservancies in Namibia, namely:
Na#Jaqna
Ondjou
Kabulabula
We built camps in Na Jaqna, Ondjou, and Kabulabula. Thormahlen & Cochran donate all the camps to the Conservancies. We deliver all the meat that we hunt, to the conservancies, and donate to every local school the blue bags. We are building roads, and are responsible for the water and electricity supply for the camps. We employ the local community as staff and currently employ 5 to 6 conservancy members as staff . We are also responsible for the training of the staff to be able to serve the overseas clients. To date we have 32 community members employed in the various camps. We also have social responsibilities towards the conservancies: we built a school hostel, a community hall, drilling of waterholes, making cutlines, building roads etc. We are buying protective clothing to the game guards and uniforms for the personnel on an annual basis and opened another drilling hole for N$460,000.

14. I declare that the foregoing is true and correct.

Signature:

Name: _FPJ Thormahlen Title: Mr

Attachment: 1:



APPLICANT:

JIM LINES

NOTICE

OF

REPRESENTATION

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III, of the non-profit firm CONSERVATION FORCE as my attorney and legal representative for all matters concerning my application for a Permit to Import a threatened-listed Elephant Trophy from Namibia.

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 this attorney be copied with all correspondence, acknowledgements, notices and decisions concerning my application at the following address:

CONSERVATION FORCE
3240 S. I-10 Service Road W, Suite 200
Metairie, Louisiana 70001
USA
Tel.: (504) 837-1233
Fax: (504) 837-1145
Email: cf@conservationforce.org

(b) (6) [redacted]

SIGNATURE

JAMES LINES
PRINT FULL NAME

7/2/2020
DATE

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

JUN 22 2018

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
N/A	N/A	N/A	N/A

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
N/A	N/A	N/A	N/A

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)
Green Oaks Museum & Educational Center	Green Oaks Museum & Educational Center

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
82-1330846	This Museum and Educational Center is for local schools and the general public to view a collection of already over 150 species.

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
Van Beek	Arden	Neal	Mr.

5. Principal officer title	6. Primary contact name
President	Brandon Van Beek

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
(b) (6)			

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Hudson	South Dakota	57034	Lincoln	USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
Hudson	South Dakota	57034	Lincoln	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 applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   N/A

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Brandon Van Beek, ([redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

N/A

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   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:

   Our hunt will take place int he northeast region of Namibia, formerly the Caprivi Region. We will be hunting in the following conservancies: Salambala , Kabulabula , Lusese , Bamunu , Kasika. The largest nearest city would be Katima Mulilo.

   b. Date wildlife is to be hunted:

   October 1 - 15, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   Byron Hart, of Zambezi East Hunting Safaris.

   +264 81 124 7795
   byron@zambezihuntiungsafaris.com

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   N/A

   b. Date wildlife was hunted:

   N/A

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

N/A

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Our permit has not been issued yet. Permit will be issued by way of quota set forth by The Ministry of Environment & Tourism of Namibia.

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: Byron Hart
Business Name: Zambezi East Big Game Safaris (ZEBG)
Address: P.O. Box 11338, Windhoek, Namibia
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?

From the aerial surveys conducted across the country, the Namibian Ministry of Environment & Tourism can say that there are approx. 22'000-26'000 elephant in Namibia at any 1 time. These are NOT all resident, especially in the North-East (Zambezi-Kavango-Bushmanland) region of the country where there is much movement across borders with Zambia, Botswana and Angola. The survey suggests that in 2015 this North-East region had 16-17'000 elephant, with approx. 2'000 in Etosha National Park and a further 2'000 in the dryer North-Western region. The survey suggests that in Zambezi Region alone were 14'000 elephant. "There are more elephant in Namibia now than 100 years ago" (K. Uiseb, Pers Comm, 03 may 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?

In total, the hunt will likely cost in the range of $80,000 to $85,000. This total includes the local community's permits, wages paid to scouts, trackers, camp staff, lodging, travel and other. Much of this cost directly impacts the villages and communities that the hunting takes place in. Not only do these monetary funds help, but also the meat from the animals hunted is often times a saving grace for many local villagers who would otherwise resort to poaching their own food and harvesting young, female and any animal they see. Zambezi East Big Game Safaris uses funds generated through hunting in many ways to help local communities. In 2016, due to flooding many local students were pushed out of their housing. ZEBG used hunter generated revenue to provide the necessary shelter for these students in their time of need.

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

ZEBG constructs many water sources for animals in their conservancies, both contractual and non-contractual. ZEBG has a commitment to education and sponsors students to attend vocational training schools. Also, ZEBG sponsored a anti-poaching soccer tournament that was planned in coordination with delegates from the local Police, Ministry of Environment & Tourism, Tribal Authority and Prison Services. At the event each organization gave speeches to the locals in attendence regarding the drastic effects of poaching and the advantages of sustainable hunting efforts.

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: (b) (6) _____ Date: 6-13-18

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.

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. NAMIBIA'S COMMUNAL CONSERVANCY CONCESSIONS (APPLICATION QUESTION 5 a.)

The Communal Conservancy Concessions are Parliament Gazetted areas that have shown an interest in conserving the natural resources for the benefit of the residents in that area. The unit is demarcated, and a natural resource management plan structured according to needs of the residents and the area. A **Management Committee** is established/employed including Chairperson, Manager, Treasurer, Secretary, Committee Members/Area Representatives and then **Game Scouts** are employed and trained in accordance to the Ministry of Environment & Tourism (MET) requirements including record keeping, patrols, laws, utilization and hunting standards and ethics. This Conservancy structure is created and monitored under supervision and in conjunction with various NGO's supporting *Community Based Natural Resource Management* (CBNRM), including:

Ministry of Environment & Tourism
Phillip Troskie Bldg, Dr Kenneth Kaunda Street, Private Bag 13306, Windhoek, Namibia
Tel: +264 61 284 2111 Fax: +264 61 232057
www.met.gov.na

Kenneth Uiseb is the "Elephant management co-ordinator" within the Government/MET.
Tel: +264 61 284 2111 kenneth.uiseb@met.gov.na

Intergrated Rural Development and Nature Conservation (IRDNC)
2nd floor, 19 Lossen street, P.O. Box 24050, Windhoek, Namibia
Tel: +264 61 228506/9 Fax: +264 61 228530
irdnc@iafrica.com.na www.irdnc.org.na

Legal Assistance Center (LAC)
4 Marien Ngouabi Street, P.O.Box 604, Windhoek, Namibia
Tel: +264 61 223356 Fax: +264 61 234953
info@lac.org.na www.lac.org.na

Namibia Nature Foundation (NNF)
76 & 78 Frans Indongo Street, P.O. Box 245, Windhoek, Namibia
Tel: +264 61 248345 Fax: +264 61 248344
info@nnf.org.na www.nnf.org.na

World Wildlife Fund in Namibia (WWF)
19 Lossen Street, Windhoek, Namibia
Tel: +264 61 239945 Fax: +264 61 239799
communications@wwf.na www.worldwildlife.org

Namibian Association of CBNRM Support Organisations (NACSO)
19 Lossen Street, P.O. Box 98353, Windhoek, Namibia
Tel: +264 61 230888 Fax: +264 61 237036
officemanager@nacso.org.na www.nacso.org.na

The Namibian Communal Conservancy Program currently has 83 Gazetted/Registered Conservancies, with over 163'017 km^2 area under Conservation Management, with not less than 189'230 people living in these areas. Since the inception of CBNRM, game populations have drastically increased in all areas, employment of community members into positions of responsibility over their own natural resources, and one of the main focuses is to alleviate poverty and manage Human Wildlife Conflict (HWC). This is mostly done through tourism and hunting to generate funds for development projects.

2. NAMIBIAN GOVERNMENT ELEPHANT MANAGEMENT PLAN (APPLICATION QUESTION 9 a.)

The Namibian Government/MET is still working according to an Elephant Management Plan that was drafted in 2007. It was reviewed in 2016 after **3 years of consecutive aerial surveys/game counts** (2013/2014/2015). MET are in the process of setting up terms of reference for a new Elephant Management Plan that is scheduled to be finished within about a year from now, with **funding for this already secured**. A new set of Terms of Reference are being formulated, they will then get a consultant in to draft the new plan by October/November of this year, and completion should be within the first quarter of 2019. It takes time, as a percentage of the decisions involve cross border/international liaison with neighbouring countries across which elephant movement occurs.

(KAZA- Kavango-Zambezi Transfrontier Conservation Area task group, Established 2011 www.kavangozambezi.org)

From the aerial surveys conducted across the country, MET can say that there are approx. 22'000-26'000 elephant in Namibia at any 1 time. These are **NOT all resident**, especially in the North-East (Zambezi-Kavango-Bushmanland) region of the country where there is much movement across borders with Zambia, Botswana and Angola. The survey suggests that in 2015 this North-East region had 16-17'000 elephant, with approx. 2'000 in Etosha National Park and a further 2'000 in the dryer North-Western region. The survey suggests that in Zambezi Region alone were 14'000 elephant. "There are more elephant in Namibia now than 100 years ago" *(K. Uiseb, Pers Comm, 03 may 2018).*

Namibia currently has a CITES quota of 90 exportable elephant. With the results of the survey, and various other annual game counts conducted within the conservancies, and the new proposed Elephant Management Plan, Government will most likely request an increase on this number from CITES. Including about 70-80 Community/Own-use elephant, and isolated Problem Animal incidents, between **190-210 total elephant are legally hunted** in Namibia per year, between 0.8-1.2% of the estimated population.

Obviously, one of the biggest concerns is the increase in HWC, as both the human and elephant populations increase and thus their effective range. Elephants are moving into and taking residence in areas formerly not frequented, including commercial farming areas. This possibly due to a combination of both drought (2014-2016) and increasing numbers, "space/food-pressure" from other herds. There are also more water points in commercial farming areas, making it convenient for family groups with young. Due to this expanding range, more HWC as well as poaching occurs. This is where the successful Communal Conservancy Conservation (CBNRM) projects come in to effect as they highlight the value of these animals to the community as a whole rather than the short-sighted individual filling pockets. **Sustainable utilization** being the topic most emphasized.

3. ZAMBEZI EAST BIG GAME SAFARIS (APPLICATION QUESTION 9 c.)

Zambezi East Big Game Safaris (ZEBG) has been conducting hunting operations in the North-East Zambezi Region of Namibia (*formerly Caprivi Region*) since November 2012 when the first community hunting contracts were signed. It has since grown to become the largest operator in the Zambezi Region with currently 5 Concessions under contract. These are:

Salambala	since Nov 2012, approx. 930 km^2,	*Chairperson:* Daniel Mwinga +264 81 455 9835
Kabulabula	since Nov 2012, approx. 89 km^2,	*Chairperson:* Leonard Mbala +264 81 639 8464
Lusese	since Nov 2014, approx. 207 km^2,	*Chairperson:* Chrispen Mwilima +264 81 430 5904
Bamunu	since Feb 2017, approx. 556 km^2,	*Chairperson:* Chunga Chunga +264 81 310 8124
Kasika	since Feb 2018, approx. 147 km^2,	*Chairperson:* Fransisca Simasiku +264 81 887 5212

Hunting is conducted on as many Concessions as possible to allow a Professional Hunter (PH) the opportunity to find the oldest/most suitable bull. Obviously because of quota, we hunt from multiple camps simultaneously. Hunting is conducted in the most traditional form of finding tracks, following-up to find the suitable animal, or "spot and stalk". Hunting vehicles/boats are used only to find elephant tracks, and NOT to hunt from. No animals are shot from the vehicle at all.

3.1 Permits

The PH hunts with a permit issued by MET according to quota available in the various concessions. These permits are applied for and approved in Windhoek at the MET. On the **PERMIT TO HUNT FOR TROPHIES** is the PH's name who is responsible for the hunt, the clients name and address as per passport, the area in which the elephant may be hunted, the number of elephant to be hunted (max 2 per hunter per safari), and the dates in which the hunt may take place. On completion of the hunt, the PH, client and **Conservancy Employed** game scout all sign on the reverse of the permit against the animal hunted to confirm what is written. It is compulsory to have a game scout on the hunt at all times.

3.2 Product (ivory) chain of Custody

Salambala is our "main" concession with our biggest camp. (S 17" 51' 802 ; E 024" 37' 015) This is where most of our trophy preparation takes place. Once an elephant is harvested, the trophy is taken to this camp for skinning, and recorded in the camp trophy book. Skins are salted and treated with insecticide, and dried in a "non-cloven hoof" shed. The head is then buried in a razor-wire secured enclosure till the tusks are extracted and labelled. The game scout issues a **record ticket** (sticky) that is stuck onto the ivory, with all relevant information. They are then logged out of the camp trophy book against a signature, and transported to a quarantine facility in Katima Mulilo against Foot & Mouth Disease (FMD), where the tusks will be quarantined for minimum of 30 days. Although elephant are not carriers, State Veterinary Services requires **all** trophies coming out of Zambezi and Kavango region to be quarantined against possible cross-contamination. State Vet does the quarantining, and sprays all trophies with a bicarbonate solution before locking the trophies away, and sealing it with a veterinary seal. The State Vet keeps the keys for the entire period till the bins are opened again. Product is locked away in vaults that are secured with added steel walls and security alarms. Whilst product is at the quarantine station, there is armed security guards at all times, 1 during daylight hours, 2 at night.

Veterinary Movement Permits are issued in Windhoek at the **Ministry of Agriculture, Water and Rural Development, Veterinary Department**, only once the 30-day quarantine period is complete, under authorization of the State Vet that locked the trophies away. ZEBG was the first company to build separate salting sheds and quarantine bins for "cloven" and "non-cloven" hoofed trophies for possible cross contamination, although this is **not a requirement** by regulation.

After the 30-day quarantine period, State Vet opens the bins by cutting seals and confirms that there was no tampering, and confirm that the trophies are all recorded on the movement permit in accordance with the list that went into quarantine. An MET official is also present to issue the **Possession Permit** that allows the responsible person to be in possession of contra-ban products (Ivory & Horn). 6 measurements are taken of each tusk and recorded on the possession permit along with the Trophy Hunting Permit numbers, these are:

- Lip to tip on outside curve
- Lip to tip on inside curve
- Base to tip on outside curve
- Circumference at the lip
- Circumference at the base
- Weight

Trophies are then loaded into closed transport, and **once again sealed** with veterinary seal for transportation. A **"Red-Cross" Veterinary Permit** is then issued against the **Movement Permit** by State Vet that allows the trophies to be transported beyond the veterinary control fence south of Kavango. Product/trophies are then transported to a **separate** Veterinary Approved FMD receiving/cleaning station at Reiser Taxidermy (plot 43, Brakwater-Windhoek, Tel: +264 61 264 207, Fax: +264 61 264 209 , reiser@iway.na , sven@reiser.iway.na) where the transport seal is checked and broken by a State Vet official. Product is once again cleaned and locked in a vault. It is then ISO-coded (stamped) against the possession permit by the CITES office of MET. Once complete consignment is ready, a CITES permit is applied for and based in this an export permit is applied for.

So in summary, the following checks are completed to ensure the product is authentic:

- **Hunting permit** (area, PH, client, date specific) – MET, Windhoek
- **Game scout ticket** (area, PH, client, permit number) – MET issued
- Camp trophy log book – ZEBG
- Quarantine-in **list and stamp, sealed bin** – State Vet, Katima Mulilo
- **Veterinary Movement Permit** – State Vet Windhoek
- Quarantine-out **list and stamp, seal checked and broken** – State Vet, Katima Mulilo
- **Possession Permit** – MET, Katima Mulimo
- **Red-Cross Movement Permit** – State Vet, Katima Mulimo
- Taxidermy receiving station – transport **seal checked and broken** by State Vet

- Product is **ISO-coded** – MET/CITES
- **CITES Permit** issued
- **Export Permit** issued.

In case of any irregularities, trophies are confiscated, and in the case of State Vet, destroyed (burned). ZEBG can obviously not afford to have this happen, thus it's in our best interest to **maintain the correct chain of custody**.

Ivory from Community-use hunted elephant is delivered to MET, within 2 weeks of being hunted as per regulation, with handing in of original permit for quota control.

3.3 Meat Distribution

All meat, both trophy and community-use quota of all species hunted is distributed at ZEBG cost and logistics, **as per contract**. The conservancy is notified in advance what will be hunted in a certain area in advance. Once hunted, the distribution point is confirmed by the conservancy management. It is then the responsibility of the game scout to ensure that all meat is loaded and is delivered to this point. All PH's hunting for ZEBG are informed this procedure.

Sometimes, in logistically difficult areas, ZEBG transports the villagers to the site and back to collect the meat, under supervision of the game scout and PH. ZEBG may keep a small piece of meat, usually 5-10kg for camp use, but this is pre-arranged with management. Similarly, meat used for baiting predators is also pre-arranged and documented.

3.4 Social developments

ZEBG also responds to Social Developments within the various communities of our concessions. It is part of the contract to develop the individual communities on issues raised by the community at large. The older contracts just had a cash lump sum indicated as "Social Development" which was a yearly requirement paid over at the beginning of the hunting season. The problem with these bulk payments was that the funds were generally used for other purposes like Game Scout overtime pay or vehicle repairs rather than community development. ZEBG, along with IRDNC, helped change this in the standardized contracts to categorize individual community needs, and allocate funds to these, the total still being the original amount. An **example** of this would be:

- Anti-poaching equipment N$45'000
- Borehole drilling N$ 30'000
- Schools & Sports N$ 25'000
- Elderly N$ 25'000
- Drought/flood relief N$ 25'000
- Traditional Authority N$ 10'000

Conservancy office in construction phase, Lusese, 2016

Rather than a lump sum of N$160'000, the Conservancy management indicates a project per year per category, and we issue funds or purchase the goods/equipment for them to the value agreed on. In this way, more of the actual development funds are reaching the intended purposes.

ZEBG also contributes to development projects **outside the contractual agreement**. One conservancy in the eastern floodplains indicated a need for scholar housing, because during flood times (Jan-May), the scholars would be housed in the class-rooms or in make-shift accommodation outside school grounds because distances by mukoro (traditional canoe) to school and back was to great. ZEBG built a hostel in 2016 to house 40 scholars, this all with hunters Dollars.

Construction Phase

Make-shift scholar housing, with new accommodation (green) and school (yellow) in the background

Professional Hunter training within the conservancies is a contractual requirement, whereby an aspiring individual is selected from the conservancy and ZEBG then trains this individual to obtain the MET standard hunting license. 3 candidates (from Lusese, Salambala and Kabulabula) were sent to a Hunters Training Academy in 2016 for this initial training, 2 of which were in the top 2 positions in class. The 2 remaining candidates (Kasika & Bamunu) will be sent this year, as the Hunting academy didn't offer a course in 2017. To our knowledge, there is only 1 other operator in the Zambezi region that is training an apprentice PH.

Poaching is an ongoing problem, and as operators, ZEBG as private "individuals" are somewhat restricted in terms of the Policing Law to engage actively in anti-poaching operations. ZEBG assists where possible at all times with vehicle support and transport of Game Scouts to various operations being conducted by the military, police and MET. Having vehicles in the field is a definite deterrent and many times hunting vehicles have encountered suspicious situations whereby the "would-be" poachers have moved off or vehicles and firearms have been confiscated by game scouts.

What ZEBG can do though is create awareness against poaching, and in 2017, we sponsored an inter-conservancy soccer tournament, total 6 teams in round-robin tournament with a combined team from IRDNC & MET. The idea for this tournament came from a Prison Warden who noticed increasing convictions in poaching and decided to act. Involving the local broadcasting station (NBC), delegates from the Police, MET, Tribal Authority and Prison Services were invited to all the matches to give speeches and talk to the community at large about the poaching and the consequences there-of. The tournament itself was a success and the conservancies earned good funding for more anti-poaching activities.

ZEBG has a commitment to education. **Outside contractual requirements**, 2 student's tuition fees have been paid for by ZEBG. The first a 3 year Diploma at the Namibian Vocational Training Institute in Management and Administration, the second, a 3 year Diploma in Wildlife Management at the Wildlife College of South Africa. Both these candidates selected by the communites.

ZEBG has also contributed to the drilling of boreholes to create water-points for wildlife in the core wildlife areas of the conservancies, both contractual and non-contractual. This can only be done with Hunters Dollars.

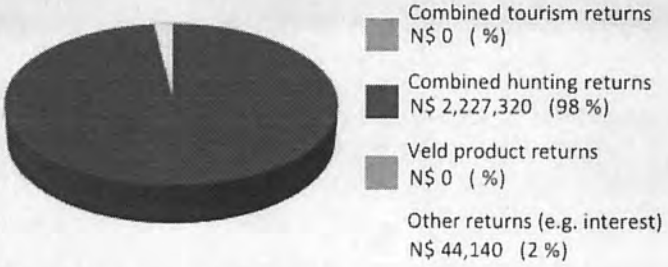
Byron Hart
+264 81 124 7795
byron@zambezihuntingsafaris.com
Professional Hunter, Big Game
National Diploma in Natural Resource Management and Nature Conservation
B-Tech Degree in Natural Resource Management and Nature Conservation
PPL (h)

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$ 2,271,460



Two of the most significant returns for the conservancy:

✓cash income to the conservancy to cover running costs and invest in developments

✓Employment to conservancy residents

Conservancy income			**N$ 2,271,460**
Employment	**Private Sector**		
	Conservancy	**14 staff**	**N$ 410,250**

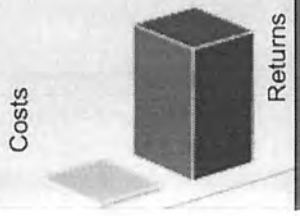
Cost of natural resource conflicts in 2016

estimates are based on average national values

Estimated human wildlife conflict cost	N$ 86,810
Estimated poached high value species loss	N$ 0
Total conflict cost estimate	**N$ 86,810**

Natural resource cost–return ratio in 2016

the chart shows the approximate ratio of returns to costs



Natural resource returns outweigh approximate conflict costs

Total returns: N$ 2,271,460

Approximate conflict costs: N$ 86,810

Approximate positive ratio 26 : 1

success story
since the very beginning.

Barry, Anna <anna_barry@fws.gov>

Green Oaks Museum & Educational Center PRT #98137C

1 message

Barry, Anna <anna_barry@fws.gov> Thu, Jul 26, 2018 at 1:02 PM
To: b(b) (6)

Dear Mr. Brandon Van Beek,

The following is in response to your request regarding the status of your application.

Your application that was received on June 22, 2018, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.

Sincerely,

Anna Barry
Senior Biologist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
Fax: 703-358-2281
E-mail: Anna_Barry@fws.gov

Please be aware that we process application on a first come first serve basis and due to the number of applications we receive some delays are unavoidable.

ALERT *You may have noticed that our* ***application forms expired 5/31/2017****. The forms are currently undergoing periodic review by the Office of Management and Budget. Once that process is complete, we will post updated application forms. In the interim, please continue to use the application forms available from our website with the expiration date 5/31/2017. We will continue to accept those forms until new ones become available. However, please check back each time you submit a new application to see whether our new forms have been posted.* ***We do not accept applications via fax or e-mail.***

Sign up for our e-newsletter to learn how we're working around the globe to protect species and their habitats!

Barry, Anna <anna_barry@fws.gov>

Green Oaks Museum & Educational Center PRT #98137C

1 message

Barry, Anna <anna_barry@fws.gov> Tue, Nov 13, 2018 at 11:11 AM
To: Brandon Van Beek (b) (6)

Received, thanks.

Anna Barry
Supervisory Policy Specialist
USFWS/Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104, ext. 1976 or 703-358-1976
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On Wed, Nov 7, 2018 at 11:08 PM, Brandon Van Beek <(b) (6)> wrote:

> Hello Anna,
>
> I forget if there was a date listed for the hunt to occur on the application. If there was it would be passed now. Please note that we have pushed this until next year in hopes that the application would clear by then.
>
> Thank you,
> Brandon
>
> On Jul 26, 2018, at 12:02 PM, Barry, Anna <anna_barry@fws.gov> wrote:
>
> Dear Mr. Brandon Van Beek,
>
> The following is in response to your request regarding the status of your application.
>
> Your application that was received on June 22, 2018, is currently under review. Please be aware that we have a significant number of applications pending, and we process applications in the order they are received in the office. The staff member working on your application has been notified of your inquiry. If there is a need for additional information or clarification on information provided in your application, the staff member will contact you directly.
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MacDonald, Tim <tim_macdonald@fws.gov>

US FWS

1 message

MacDonald, Tim <tim_macdonald@fws.gov> Mon, Sep 30, 2019 at 2:26 PM
To: b(b) (6)

Dear U.S. Fish and Wildlife Service Prt 98137C

Brandon,

On **06/22/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 98137C**. At the me of the applic aon's submission the hunt was to be held at a future date.

Please confirm at this me if y ou successfully hunted the elephant. If **yes**, please state so, and provide the date and locaon the elephan t was taken.

If **no**, do wish to withdraw your applicaon a t this me?

Please confirm the current status.

****Please note the permit that was applied for was for a specific locaon, and dat e. Permit applicaons and f ees are not transferable to another hunt, and so if you have scheduled a different hunt, you must submit a new applicaon.*

Furthermore, this applicaon was c ompleted as a business did the hunt and is imporng the troph y. Only an individuals can hunt for a sport hunted trophy. Please clarify who hunted the elephant. Of course this could be mute if the hunt was unsuccessful.

Thank you,

Tim Mac Donald

Government Information Specialist
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

MacDonald, Tim <tim_macdonald@fws.gov>

[EXTERNAL] Re: US FWS

1 message

Brandon Van Beek [redacted] > Mon, Sep 30, 2019 at 3:12 PM
To: "MacDonald, Tim" <tim_macdonald@fws.gov>

Hello Tim,

The last contact I had regarding this permit was with Anna Barry on Nov. 7, 2018 (anna_barry@fws.gov). She replied on Nov. 13, 2018.

At that point we had decided not to hunt the trophy due to the application uncertainty in hopes to take the trophy at a later date once the application was decided on. I had let Anna know this at that time.

Thank you for reaching out. Look forward to your response.

- Brandon

> On Sep 30, 2019, at 1:26 PM, MacDonald, Tim <tim_macdonald@fws.gov> wrote:
>
> Dear U.S. Fish and Wildlife Service Prt 98137C
>
> Brandon,
>
> On **06/22/2018** an applicaon f or the importaon of an Afric an Elephant, sport hunted trophy was received by this office **Prt # 98137C**. At the me of the applic aon's submission the hunt was to be held at a future date.
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>
> Thank you,
>
> **Tim Mac Donald**
>
> **Government Information Specialist**
> **Division of Management Authority**
> **Branch of Permits; MS: IA**
> US Fish and Wildlife Service
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(w) 703-358-2256
(F) 703-358-2280